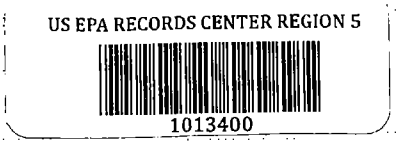
OHD 010 448 231



Bud E. Smith
Director
Environmental Control Dept.

Phone: 304-234-2662
Fax: 304-234-2613
smithbe@WPS.com

July 3, 2008

WPS 7/8/08

Mr. Michael Mikulka
U.S. Environmental Protection Agency Region 5
Land & Chemicals Division
77 West Jackson Boulevard (LU-9J)
Chicago, Illinois 60604

Re: RCRA Section 3007 Request for Information - Martins Ferry Plant

Dear Mr. Mikulka,

Attached is Wheeling Pittsburgh Steel's ("WPS") response to the U.S. Environmental Protection Agency's ("USEPA") information request, dated May 29, 2008, and received by WPS on June 5, 2008.

USEPA describes its May 29, 2008, information request as "a request for information pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 United States Code (USC) §6927," regarding WPS's facility in Martins Ferry, Ohio. However, your letter asks WPS to "submit certain information relating to management of, and/or potential or actual releases of, hazardous waste or hazardous waste constituents." RCRA §3007 requires that WPS provide "information relating to [hazardous] wastes." There is no mention of "hazardous waste constituents" in this section of RCRA. Thus, the information provided is in accord with RCRA §3007 as per your letter and the previous correspondence from Tom Williams. Furthermore, WPS's response in no way represents an admission as to WPS's status under any regulatory programs, including those mentioned in your letter, the application of any such programs to WPS's Martins Ferry facility and WPS expressly does not waive any rights, arguments or positions WPS may be able to assert with regard to such programs or the facility.

WPS strives to provide complete and accurate information to regulatory agencies whenever possible, and we continue to do so with this response. WPS reserves the right to supplement its response, as necessary and as additional and responsive information becomes available. Pursuant to 40 CFR Part 2, WPS asserts business confidentiality covering all of the information submitted in response to USEPA's information request.

As USEPA has requested, the certification statement assuring this data is included below.

Finally, WPS requests that USEPA provide WPS with access to or copies of all documents described in Attachment 2, Preliminary Reference List, to USEPA's May 29, 2008 information request. Please let me know how USEPA will accommodate this request.

Please let us know if we can be of further assistance in this matter.

Sincerely,

Bud E. Smith

Bud E. Smith

Certification Statement

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature Bud E. Smith

Bud E. Smith
Director, Environmental Control

Response to USEPA's RCRA §3007 Information Request
For WPS's Martins Ferry Plant

WPS's responses below are numbered to match each item of USEPA's May 29, 2008 information request. Thus, for example, WPS's item number 1 below contains information in response to item 1 of USEPA's information request, and so on. WPS has also numbered the documents that it has attached in response to USEPA's information request. Those documents are numbered as Attachments in sequential order.

As an initial matter, WPS objects to USEPA's May 29, 2008 request to the extent that it seeks information that is subject to attorney-client privilege, attorney work product privilege or any other applicable privilege. WPS notes that USEPA seeks such information in the "General Instructions" to its information request ("The scope of this request also includes all information and documents independently developed or obtained by research on the part of WPSC, its attorneys....").

As an additional initial matter, WPS objects to USEPA's May 29, 2008 information request to the extent that it seeks information beyond the scope of USEPA's authority. Generally, WPS notes that USEPA's legal counsel, Thomas Williams, has consistently identified RCRA §3007 as the investigative authority under which USEPA is acting. See Attachment 12. Similarly, USEPA's May 29, 2008 information request specifically states that such request is being made pursuant to RCRA §3007 only. Therefore, WPS disagrees with and does not admit USEPA's assertion that any of the locations identified by USEPA on Attachment 1 (Preliminary List of Solid or Hazardous Waste Management Areas) to the information request are "solid or hazardous waste management areas" or "units." As USEPA is aware from previous correspondence, WPS disagrees with any characterization of these locations as "Solid Waste Management Units" (SWMUs) or "Hazardous Waste Management Units." Furthermore, since USEPA's information request is made pursuant to RCRA §3007 and seeks information "to determine the facility's compliance status with the regulations applicable to large quantity hazardous waste generators," WPS questions and disputes the relevance of these designations. WPS notes that many of the items of information sought in the information request concern materials that are exempt from or not covered by the provisions of RCRA §3007 or any of the other statutory authorities cited in the information request (42 U.S.C. §§ 6927, 6928(h), 6934 and 6973 and Ohio Administrative Code §3745-52) cited by USEPA as the basis for its request. While preserving and without waiving this objection, WPS has provided information in response to USEPA's May 29, 2008 information request, including information concerning materials and issues that may be beyond the scope of RCRA §3007.

1. In response to item 1 of USEPA's May 29, 2008 information request, Attachment 1 to WPS's response contains an environmental flow diagram for the Martins Ferry plant. This diagram contains information regarding overall facility production and each current major process area.

2. Attachment 2 contains a copy of WPS's annual hazardous waste report for 2007 for the Martins Ferry plant.

3. Attachment 3 describes all the solid wastes currently generated at the Martins Ferry plant according to your request. Attachments 4 thru 6 and 8 are the analytical results for representative samples of these wastes. Attachment 7 is the MSDS for the marking ink from which the ink sludge is derived. This is the basis for the "generator knowledge" determination of this hazardous waste. No "listed" hazardous wastes are generated at the Martins Ferry plant.

4. Attachment 9 is a map from our Hazardous Waste contingency plan showing the locations of existing hazardous waste accumulation areas. A similar map for non-hazardous wastes does not exist. Hazardous wastes generated at this plant may include Chem-treat waste, Ink Sludge, and Maintenance Painting wastes. Chem-treat waste is accumulated at the 48-inch and 60-inch Galvanizing lines (locations A and C) and loaded to a rolloff box the day of shipment at a location outside the north end of the plant (location G). Ink Sludge is stored in satellite accumulation drums at the 48-inch and 60-inch lines (locations A and C). Maintenance painting wastes are accumulated intermittently at the Paint House. When necessary, the Oil House (location F) may be used as a less than 90 day accumulation area.

5. Attachment 1 contains a diagram of the Martins Ferry plant's wastewater treatment operations. Item 5 of USEPA's May 29, 2008 information request is unclear and confusing; it is unclear whether item 5 seeks information about the Martins Ferry "plant" as a whole or whether it seeks information solely about the Martins Ferry plant's "wastewater treatment operations." To the extent that item 5 seeks information about the Martins Ferry's plant's wastewater treatment operations, the Martins Ferry plant's wastewater treatment facility became operational before 1985. An Equalization Tank was installed in 2008 and is currently under testing prior to startup in mid-July.

   The capacities of the wastewater units are as follows:

Looping Pit Holding Tank	16,000 gallons
Upstairs Hold Tank	16,000 gallons
Waste Treat Sump	28,500 gallons
Lime Silo	55 tons
Primary tank	10,000 gallons
Sludge Tank	10,000 gallons
Secondary Tank	10,000 gallons
Clarifier	300,000 gallons
Stormwater Tank	150,000 gallons
Equalization Tank	200,000 gallons (new 2008)

6. Attachment 10 contains information concerning the current and past stormwater drains, infrastructure and discharge points, including correspondence with the Ohio Environmental Protection Agency, sampling and analytical results and a map. See also response 7 below.

7. Abandoned stormwater drains are shown on Attachment 10. Sewers for outfalls 003 and 004 were abandoned (plugged) in 2004. Outfall 002 is plugged with sediment as a result of hurricanes Ivan and Francis in 2004 and annual flooding. The outfall 005 sewer system no longer handles stormwater from the Martins Ferry plant since the lateral sewers entering the main 005 sewer were plugged in 2004 to prohibit any plant property stormwater from entering the 005 sewer system.

8. Attached is the 100-year flood plain map, Attachment 11.

9. As noted above, WPS disagrees with and does not admit USEPA's assertion that any of the locations identified by USEPA on Attachment 1 (Preliminary List of Solid or Hazardous Waste Management Areas) to its May 29, 2008, information request are "solid or hazardous waste management areas" or "units." WPS has previously stated to USEPA on numerous occasions that WPS disagrees with any characterization of these locations as "Solid Waste Management Units" (SWMUs) or "Hazardous Waste Management Units." WPS notes that many of the items of information sought in USEPA's May 29, 2008 information request concern materials that are exempt from or not covered by the provisions of the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6927, 6928(h), 6934 and 6973, or the Ohio Administrative Code cited by USEPA as the basis for its requests. As such, WPS objects to USEPA's requests for information beyond the scope of the legal authority that it cites.

   Please see Attachment 12.

   Based on testing and/or generator knowledge, the areas identified by USEPA on its Attachment 1 do not have the potential to have or contain hazardous waste, except for those listed in Attachment 3 to WPS's response (i.e., locations at which Chem-treat waste, Ink Sludge and Painting Wastes are gathered).

10. Attachment 13 is a list of incidents (7) in which a material was accidentally spilled. In four of these incidents the material was contained on pavement and did not enter the soil. Of the other three incidents, one exceeded a "reportable quantity" due to a diesel fuel spill that was promptly cleaned up.

11. There is and has been no location or facility described or identified as the "TFS Sump" at the Martins Ferry plant, to the best of WPS's knowledge.

12. WPS requests clarification from USEPA concerning the possible hazardous waste significance of PCB and non-PCB equipment. As USEPA knows, the RCRA program does not cover PCB equipment. Nonetheless, in order to be as cooperative as possible, WPS provides the following information.

    The GE capacitors marked "no PCBs" and which were located on a pallet in the vicinity of the less-than-90 day storage area at the Martins Ferry plant at the time of the March 31, 2008 USEPA inspection have not been tested. The GE capacitors have been determined to be non-PCB based on the manufacturer's original markings. These capacitors are unused spares and remain usable.

13. WPS requests clarification from USEPA concerning the possible hazardous waste significance of "oil storage." As USEPA knows, the RCRA program does not cover oil. Nonetheless, in order to be as cooperative as possible, WPS provides the following information.

    The area outside the "oil storage building" has not been used in the past nor is currently being used to store full containers.

    On one occasion (April 18, 2001), Ohio Environmental Protection Agency and WPS personnel observed black staining on the pavement near what USEPA refers to as the "oil storage building" and a nearby soil area. The stained area was due to surface runoff outside a bermed area for empty totes. A stain on the asphalt pavement ran approximately 20 ft long and 1 ft wide to a soil area which had staining approximately 3 ft by 3 ft. This staining was believed to have resulted from rain runoff from oil that had adhered to the outside of the empty totes. The stained surface area and soil were cleaned up shortly after observation.

14. With regard to the "former acid/alkali storage area near the river" that USEPA refers to in item 14 of its May 29, 2008 information request, it is WPS's understanding that, prior to 2000, acid and alkali wastes at that location were managed as hazardous waste and placed into rolloff boxes. WPS has been unable to locate any records pertaining to determinations for acid and alkali wastes at that location. WPS has not identified any spills of these materials in this location as part of this past practice.

15. The green liquid referred to in item 15 of USEPA's May 29, 2008 information request and as shown on USEPA's photo P4010006, has been removed. WPS believes it to have been an antifreeze leak from a contractor vehicle. Due to our knowledge of this material, it was removed to be visually clean, and placed in a container for non-hazardous wastes.

16. The reddish-brown material near the coal pile was sampled, determined to be non-hazardous, and disposed as such. See Attachment 14 (Analytical Report).

17. WPS requests clarification from USEPA concerning the possible hazardous waste significance of "used oil." As USEPA knows, the RCRA program does not cover oil. Nonetheless, in order to be as cooperative as possible, WPS provides the following information.

    The "former waste oil tank" described in item 17 of USEPA's May 29, 2008 information request was a steel, open topped tank. This tank was removed from service in 1999. WPS has no record of spills from this former used oil tank or in its vicinity.

18. The "waste acid/alkali tank" referred to in item 18 of USEPA's May 29, 2008 information request is located in the basement of the Martins Ferry plant beneath the 60" line. This tank is part of the plant's wastewater treatment system. To the best of WPS's knowledge, no structural assessment is required or has been performed on this tank or its support structure. This tank is contained by the concrete basement of the Martins Ferry plant. WPS has no record of spills or leaks from this tank or its appurtenances.

19. The "waste sump" referred to in item 19 of USEPA's May 29, 2008 information request is located in the basement of the Martins Ferry plant beneath the 60" line. The sump is part of the plant's wastewater treatment system. To the best of WPS's knowledge, no structural assessment is required or has been performed on the sump. This sump is contained by the concrete basement, and WPS has no record of spills or leaks from this sump.

20. With regard to the 36" galvanizing line referred to in item 20 of USEPA's May 29, 2008 information request, contrary to USEPA's apparent understanding, that line is not and has not been permanently closed by WPS. Recent public reports regarding operations at the Martins Ferry plant pertain to labor rules (number of workers) and not to which lines can be or will continue to be operated by WPS. A change in market conditions could dictate that this line be operated.

    With regard to the "sludge/residue" referred to in item 20, the residues beneath the chemtreat section of this line were removed in May 2008. Attachment 15 is the hazardous waste manifest which includes these residues.

21. With regard to the "Roll Grinder shop" referred to in item 21 of USEPA's May 29, 2008 information request, the roll grinder for the rubber chemtreat rolls typically operates four hours per week to process a total of four rolls. Solids from this operation have been analyzed and found to be non-hazardous (see Attachment 16). As such, they are discarded with plant trash, and volumes have not been determined.

22. WPS requests clarification from USEPA concerning the possible hazardous waste significance of PCB and non-PCB equipment. As USEPA knows, the RCRA program does not cover PCB equipment. Nonetheless, in order to be as cooperative as possible, WPS provides the following information.

    Based on our observation after the April 1, 2008 inspection referred to in item 22 of USEPA's May 29, 2008 information request, the signage for the transformer in question may have been confusing to USEPA. Transformer TF-3A, Serial No. 6530907, shows no evidence of leakage. Transformer TF-1A, Serial No. 10556, has black staining on the concrete pad beneath it. This latter transformer is shown in USEPA pictures provided to WPS after the April 1, 2008 inspection. Based on this, WPS assumes that USEPA is actually referring to Transformer TF-1A.

    Transformer TF-1A uses 10 C mineral oil as its cooling medium. To the best of WPS's knowledge, PCBs have never been used in this transformer. To WPS's knowledge, no active leak was observed on April 1, 2008, and no such leak has been

observed since. Additionally, WPS does not believe the "weathered" stain below Transformer TF-1A poses a risk to the environment. Still, as a precautionary measure, an outside electrical equipment contractor has been contacted to assess whether Transformer TF-1A is currently at risk to leak and recommend repairs, if needed.

23. Again, as noted above, WPS disagrees with and does not admit USEPA's assertion that any of the locations identified by USEPA on Attachment 1 (Preliminary List of Solid or Hazardous Waste Management Areas) to its information request dated May 29, 2008 are "solid or hazardous waste management areas" or "units." Subject to the above disagreement and without admitting that any of the described locations are "solid or hazardous waste management areas" or "units,"

    USEPA's information request contained in item 23 is vague, unclear and confusing. Item 23 appears to request essentially the same information as item 9, though it also references "storm water" and "wastewater treatment systems."

    See responses 1, 5, 6, 7, 9 above. All sewers at the Martins Ferry plant were constructed prior to 1985. See Attachment 10 for a diagram of these sewers. Other than the responses and Attachments noted above, WPS does not have information regarding the other items requested in this item 23.

24. Currently, WPS has no knowledge of any evidence that the integrity of the "old buried clay pipeline" referred to in item 24 of USEPA's May 29, 2008 information request has been compromised.

25. See response 6 above and Attachment 10.

26. With regard to the USEPA inspection of the Martins Ferry plant's wastewater treatment facility on April 1, 2008 as referred to item 26 of USEPA's May 29, 2008 information request, the oil skimmer located at that facility does not operate continually, but instead is operated on an as-needed basis as determined by the facility's operator. At the time of USEPA's April 1, 2008 inspection, the operator did not believe that the skimmer needed to be in operation, based on the operator's observations and knowledge of the facility.

27. WPS could not locate the letter identified by USEPA as Reference 3 on Attachment 2 to USEPA's May 29, 2008 information request, which WPS notes is identified on that "Preliminary Reference List" as a December 9, 1988 letter from the Ohio Environmental Protection Agency to WPS, not a letter from WPS. Additionally, WPS could not locate the background information described in item 27 of USEPA's May 29, 2008 information request.

28. WPS requests clarification from USEPA concerning the possible hazardous waste significance of PCB and non-PCB equipment. As USEPA knows, the RCRA program does not cover PCB equipment. Nonetheless, in order to be as cooperative as possible, WPS provides the following information.

With respect to the Plant 1 electrical substation transformers referred to in item 28 of USEPA's May 29, 2008 information request, to the best of WPS's knowledge, none of these transformers has ever contained PCBs. During USEPA's April 1, 2008 inspection, USEPA obtained a soil sample from this location. After conducting a laboratory analysis, USEPA provided WPS with analytical results which indicated that no PCBs were detected in that soil sample.

With regard to EPA assertion of soil staining outside the fence and adjacent to the transformers as referred to in item 28 of USEPA's May 29, 2008 information request, and in reviewing the photos provided by Ohio EPA and our subsequent observations we have located no stained soil outside the substation fenced area. Further investigation of soils inside the substation is not feasible until such a time as this substation is de-energized. WPS has no schedule for this activity at this time.

29. The request contained in item 29 of USEPA's May 29, 2008 information request is vague and unclear. Item 29 refers to "reported exceedances from the galvanizing baghouse," but does not identify specific exceedances, any standards that were allegedly exceeded, or the particular substances about which USEPA is seeking information. To the extent that USEPA is requesting information, generally, about any analysis or studies concerning "the potential for deposition of dust" from the galvanizing baghouse on WPS's property or surrounding areas, WPS is unaware that any such analysis or studies exist or that any "risks" have been "identified with respect to such deposition."

30. With reference to the "yellow color" material referred to in item 30 of USEPA's May 29, 2008 information request, WPS believes that this material is a non-hazardous waste identified by WPS as "Galvanizing Baghouse Cleanout." On regular occasions, the baghouse modules are cleaned out, which generates a material similar to what USEPA describes in item 30. This cleaning generates "Galvanizing Baghouse Cleanout." Further, WPS has inspected the location described in item 30 and has removed the "drips" referred to for appropriate disposal.

31. - 38. Items 31 through 38 of USEPA's May 29, 2008 information request seek information regarding virgin petroleum underground storage tank issues which are exempt from RCRA regulation, and are instead regulated by the State of Ohio Department of Commerce, Division of State Fire Marshal, Bureau of Underground Storage Tank Regulations ("BUSTR"). As such, WPS objects to USEPA's requests for information contained in items 31 through 38. USEPA's May 29, 2008 information request does not cite any legal authority that supports its request for the information sought in items 31 through 38. Moreover, to the extent that that information may be publicly available information (e.g., "reports provided to regulatory agencies (e.g., BUSTR)," USEPA may easily obtain that information from such sources.

In further response, Attachment 17 is a copy of the relevant No Further Action letter from Kelly J. Gill, Corrective Action Supervisor for the Ohio Department of Commerce, Division of State Fire Marshall, Bureau of Underground Storage Tank Regulations.

Attachments

1- Environmental Flow Diagram, Martins Ferry Plant
2- 2007 Hazardous Waste Report, Martins Ferry Plant
3- Solid Wastes Generated, Martins Ferry Plant
4- Analytical Report - Treatment Plant Sludge (Sample ID MF-PJS-08001)
5- Analytical Report - Galvanizing Baghouse Dust (Sample ID MF-PJS-07003)
6- Analytical Report - Chem-treat Waste (Sample ID MF-PJS-06008)
7- Material Safety Data Sheet, Pannier #3 Black Ink
8- Analytical Report - Galvanizing Cleanup Sludge (Sample ID MF-PJS-07002)
9- Map of Hazardous Waste Locations
10- Sewer/Stormwater Drain Map
11- 100-Yr FEMA Flood Map
12- Correspondence from Mr. Thomas Williams, USEPA to Mr. Kenneth Komoroski
13- Spill History, Martins Ferry Plant
14- Analytical Report - Red Material near Coal Pile (Sample ID MF-PJS-08003)
15- Hazardous Waste Manifest for Chem-treat material
16- Analytical Report - Rubber Roll Grindings (Sample ID MF-PJS-02506)
17- Ohio Department of Commerce (BUSTR) No Further Action Letter

Response to USEPA's RCRA §3007 Information Request
For WPS's Martins Ferry Plant

Attachments

1- Environmental Flow Diagram, Martins Ferry Plant
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7- Material Safety Data Sheet, Pannier #3 Black Ink
8- Analytical Report - Galvanizing Cleanup Sludge (Sample ID MF-PJS-07002)
9- Map of Hazardous Waste Locations
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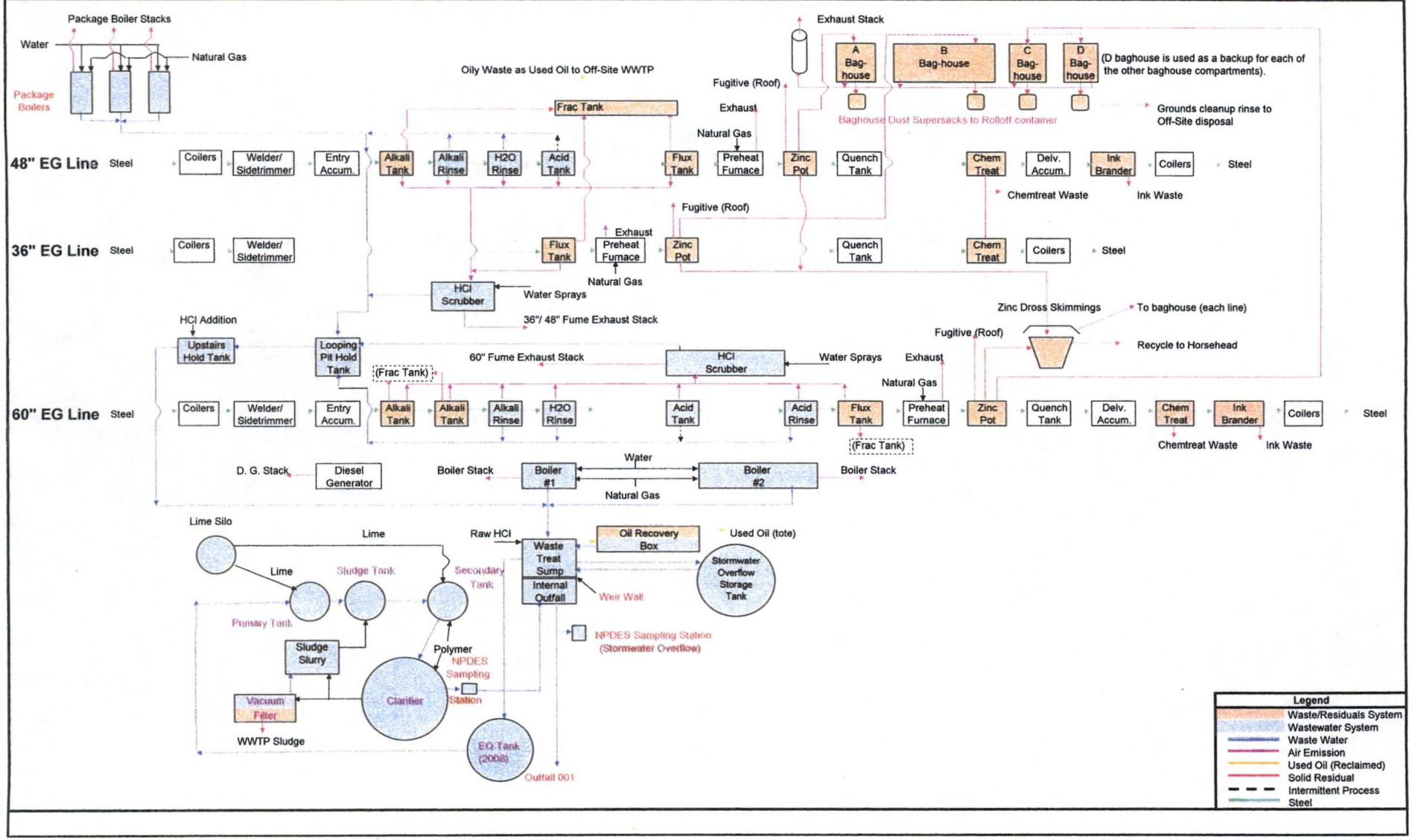
15- Hazardous Waste Manifest for Chem-treat material
16- Analytical Report - Rubber Roll Grindings (Sample ID MF-PJS-02506)
17- Ohio Department of Commerce (BUSTR) No Further Action Letter

ENVIRONMENTAL FLOW DIAGRAM
MARTINS FERRY



Att #1

Window: "2007 Annual report for WPS Martins Ferry"

ATT #2

Facility

Reason for Submittal:

To provide subsequent notification

✓ As a component of the Hazardous Waste Report

Site Name and Location

County: Belmont EPA ID: OHD010448231

Site Name: WPS Martins Ferry

Site Location: 1001 Main Street

City: Martins Ferry State: OH Zip: 43935

Contact

First Name: Patrick M/I: J Last Name: Smith

Title: Environmental Engineer Phone: (740) 283-5542 Ext:

Fax: (740) 283-5779 Ext:

EMail: smithpj@wpsc.com

Mailing Address:

☐ Same as location

Street: 540 Commercial Avenue

City: Mingo Junction State: OH Zip: 43938

Country: USA

Site Land type: Private

NAICS

A: 332813 C:

B: 332114 D:

Owner/Operator Information

Page 1 of 2

Owner

Owner/Operator type: Private

Date Became Owner/Operator: 01/01/1968

Name of legal owner/operator: Wheeling Pittsburgh Steel Corporation

Address

Address: 1134 Market Street

City: Wheeling State: WV

Phone: (304) 234-2662 Zip: 26003

Country: United States o

Operator

Owner/Operator type: Private

Date Became Owner/Operator: 01/01/1968

Name of legal owner/operator: Wheeling Pittsburgh Steel Corporation

Address

Address: 1134 Market Street

City: Wheeling State: WV

Phone: (304) 234-2662 Zip: 26003

Country: United States o

Comments:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Certification

Certification

First Name Patrick Title Environmental Enginee

Last Name Smith Date signed 02/26/2008

Hazardous Waste

Hazardous Waste Activities

Generator Status

☑ Large Quantity Generator (LQG):
Greater than 1,000 kg/mo (2,200 lbs) of non-acute hazardous waste.

☐ Small Quantity Generator (SQG):
100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste.

☐ Conditionally Exempt Small Qty Generator (CESQG)
Less than 100 kg/mo (220 lbs) of non-acute hazardous waste.

In addition, indicate other generator activities

☐ United States Importer of Hazardous waste

☐ Mixed Waste (hazardous and radioactive) Generator

Hazardous Waste Report Generator Status

☑ Large Quantity Generator (LQG):
Greater than 1,000 kg/mo (2,200 lbs) of non-acute hazardous waste was generated at the site in any one month.

☐ Small Quantity Generator (SQG):
In one or more months the site generated greater than 100 kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste.

☐ Conditionally Exempt Small Qty Generator (CESQG):
The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.

☐ Non-Generator
The site did not generate any hazardous waste during the calendar year.

Other Activities

☐ Transporter of Hazardous waste

☐ Treater, Storer, or Disposer of Hazardous waste

☐ Recycler of Hazardous waste

Exempt Boiler and/or Industrial Furnace

☐ Small Quantity On-site Burner Exemption

☐ Smelting, Melting, Refining Furnace Exemption

☐ Underground Injection Control

Universal Waste

Universal Waste Activities

Large Quantity Handler

	Managed
Batteries	
Pesticides	
Mercury Containing Equipment	
Lamps	

Destination Facility for Universal Waste

Large Quantity Handler of Universal Waste (LQHUW)

Used Oil

Used Oil Activities

Transporter

- ☐ Transporter
- ☐ Transfer Facility

Processor and/or Re-refiner

- ☐ Processor
- ☐ Re-refiner

☐ **Off-Specification burner**

Fuel Marketer

- ☐ Marketer who directs shipment of off-spec used oil
- ☐ Marketer who first claims the used oil meets the spec.

Waste Codes for Federally Regulated Hazardous Wastes

D001	D002	D007		

Waste description (60 spaces max): Page no: 1

Chromium cleanup waste from surface treatment of steel

D007

Mgmt method code:

Source code: G13

Waste form code: W316

Quantity Generated

Previous year: 14160

This year: 14760

Unit of measure: P Density: ◯ lbs/gal ◯ sg

Was this waste treated, disposed of, or recycled on-site? ◯ Yes ● No

	System 1	System 2
RCRA-exempt system?	☐	☐
On-site system type		

Quantity treated, disposed or recycled in the reporting year:

Was any of the waste shipped off-site during the reporting year? ● Yes ◯ No

EPA ID of Receiver	Mgmt method code	N/A	Total Quantity Shipped in Reporting Year
MID000724831	H111		12680
PAD004835146	H111		2080

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ◯ Yes ● No

☐ Generated / Accumulated during the reporting year

Generated / Accumulated prior to the reporting year

An inactive disposal unit undergoing closure? ◯ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Waste description (60 spaces max):
Sludge from ink solvent recovery

D001

Mgmt method code:

Source code: G07

Waste form code: W604

Quantity Generated

Previous year: 1550

This year: 1700

Unit of measure: P Density: ○ lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?		
On-site system type		

Quantity treated, disposed or recycled in the reporting year:

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	N/A	Total Quantity Shipped in Reporting Year
KYD053348108	H061		1700

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated / Accumulated during the reporting year

Generated / Accumulated prior to the reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

Waste description (60 spaces max): Page no: 3

Used oil emulsion contaminated with acid

D002

Mgmt method code:

Source code: G31

Waste form code: W205

Quantity Generated

Previous year: 0

This year: 13819

Unit of measure: G Density: 8.00 ● lbs/gal ○ sg

Was this waste treated, disposed of, or recycled on-site? ○ Yes ● No

	System 1	System 2
RCRA-exempt system?		
On-site system type		
Quantity treated, disposed or recycled in the reporting year:		

Was any of the waste shipped off-site during the reporting year? ● Yes ○ No

EPA ID of Receiver	Mgmt method code	N/A	Total Quantity Shipped in Reporting Year
OHD020273819	H134		9557
OHD004274031	H135		4262

As of December 31st, did any of this waste remain on site in:

A greater than 90 day storage unit? ○ Yes ● No

☐ Generated / Accumulated during the reporting year

Generated / Accumulated prior to the reporting year

An inactive disposal unit undergoing closure? ○ Yes ● No

Storage or Disposal Unit	Handling Code	Amount	Unit of Measure	Density	Density Unit
1					

Comments:

PAD004835146 Max Environmental Technologies, Inc. Transporter

Address: 233 Max Lane Receiver ✓

City: Yukon State: PA Zip: 15698

MID000724831 Michigan Disposal Waste Treatment Plant Transporter

Address: 49350 N. I-94 Service Drive Receiver ✓

City: Belleville State: MI Zip: 48111

KYD053348108 Safety-Kleen Systems, Inc. Transporter

Address: 3700 Lagrange Road Receiver ✓

City: Smithfield State: KY Zip: 40068

OHD020273819 Vickery Environmental Inc. Transporter

Address: 3956 State Route 412 Receiver ✓

City: Vickery State: OH Zip: 43464

OHD004274031 Perma-Fix of Dayton, Inc. Transporter

Address: 300 S. West End Avenue Receiver ✓

City: Dayton State: OH Zip: 45427

AR000042341 EAP Industries, Inc. Transporter ✓

Address: Receiver

City: State: Zip:

HD009865825 Dart Trucking Company, Inc. Transporter ✓

Address: Receiver

City: State: Zip:

XR000050930 Safety-Kleen Systems, Inc. Transporter ✓

Address: Receiver

City: State: Zip:

YD980769947 Hazmat Environmental Group Transporter ✓

Address: Receiver

City: State: Zip:

HR000105395 Kepich Transport Inc. Transporter ✓

Address: Receiver

City: State: Zip:

D054126164 Freehold Cartage Inc. Transporter ✓

Address: Receiver

City: State: Zip:

Validation results as of 2/26/2008 3:00 pm
Errors: 0 Warnings: 0

Attachment 3

Wheeling Pittsburgh Steel
Martins Ferry Plant
Solid Wastes Generated

Waste	Generating Process	Location Collected
Hazardous		
Chem-treat Waste	Galvanizing Lines, maintenance and cleaning of chemtreat sections	Each galvanizing line (to 1 CY bags)
Ink Sludge	Recycling of Solvent from Brander Units at 48-in and 60-in Galv lines	48-in and 60-in Brander Sections
Maintenance Painting Wastes	Intermittent painting of plant and equipment	Paint House
Non-hazardous		
Galvanizing Cleanup Sludge	Cleanups of Alkali, Flux, and Rinse sections of Galv Lines	Containers north of WWTP
Galvanizing Baghouse Dust	Galvanizing Lines, zinc pot dust (all three)	Baghouse modules (all four)
Rubber Roll Grindings	Grinding of rubber rolls	Machine Shop
Wastewater Treatment Plant Sludge	Galvanizing Lines, wastewater from strip rinsing	Wastewater Treatment Plant

Att #3

Att #4

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

PROJECT NO. MF-PJS-08001

Wheeling Pittsburgh Steel

Lot #: C8C190322

Pat Smith

Wheeling Pittsburgh Steel

TESTAMERICA LABORATORIES, INC.

Christina M. Kovitch
Project Manager

March 25, 2008

301 Alpha Drive Pittsburgh, PA 15238 tel 412.963.7058 fax 412.963.2468 www.testamericainc.com

NELAC REPORTING:

At the time of analysis the laboratory was in compliance with the current NELAC standards and held accreditation for all analyses performed unless noted by a qualifier. The labs accreditation numbers are listed below. The format and contents of the report meets all applicable NELAC standards except as noted in the narrative and shall not be reproduced except in full, without the written approval of the laboratory. The table below presents a summary of the certifications held by TestAmerica Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is Pennsylvania DEP. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State/Program	Certificate #	Program Types	TestAmerica
NFESC	NA	NAVY	X
US Dept of Agriculture	(#P330-07-00101)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW	X
		HW	X
California – NELAC	04224CA	WW	X
		HW	X
Connecticut	(#PH-0688)	WW	X
		HW	X
Florida – NELAC	(#E87660)	WW	X
		HW	X
Illinois – NELAC	(#200005)	WW	X
		HW	X
Kansas – NELAC	(#E-10350)	WW	X
		HW	X
Louisiana – NELAC	(#93200)	WW	X
		HW	X
New Hampshire – NELAC	(#203002)	WW	X
		–	–
New Jersey – NELAC	(PA-005)	WW	X
		HW	X
New York – NELAC	(#11182)	WW	X
		HW	X
North Carolina	(#434)	WW	X
		HW	X
Pennsylvania - NELAC	(#02-00416)	WW	X
		HW	X
South Carolina	(#89014001)	WW	X
		HW	X
Utah – NELAC	(STLP)	WW	X
		HW	X
West Virginia	(#142)	WW	X
		HW	X
Wisconsin	998027800	WW	X
		HW	X

The codes utilized for program types are described below:

HW Hazardous Waste certification
WW Non-potable Water and/or Wastewater certification
X Laboratory has some form of certification under the specific program. Many states certify laboratories for specific pararneters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

Updated: 12/28/07 C:\Documents and Settings\derubeisn\My Documents\NELAC NARRATIVE Pttsburgh.doc

CASE NARRATIVE
Wheeling Pittsburgh Steel

LOT # C8C190322

Sample Receiving:
TestAmerica Pittsburgh received one sample on March 19, 2008. The cooler was received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

TCLP Metals:
The sample was analyzed at a dilution for arsenic, cadmium, chromium, lead and silver due to zinc being over the instrument's linear range and causing zinc saturation.

General Chemistry:
There were no problems associated with the analysis.

METHODS SUMMARY

C8C190322

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 1311/3010
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A	SW846 1311/7470
Total Residue as Percent Solids	MCAWW 160.3 MOD	MCAWW 160.3 MOD

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C8C190322

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
KJWEQ	001	MF-PJS-08001 WWTP SLUDGE	03/07/08	10:20

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

C8C190322

Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TAL-4142 (0907)

Client	Project Manager	Date	Chain of Custody Number
WHEELING PITTSBURGH STEEL	C. KOVITCH		366836
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page** 1 of 1
COMMERCIAL AVENUE			
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	**Analysis (Attach list if more space is needed)**
MINGO JCT / OH / 43938	PAT [redacted]		
Project Name and Location (State)	**Carrier/Waybill**		
	[redacted]		
Contract/Purchase Order/Quote No.	**Matrix** / **Containers & Preservatives**		

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Air	Aqueous	Sed	Soil	Waste	Unpres	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	TCLP 8 MRA metals	% solids	Special Instructions/ Conditions of Receipt
MF-PJS-08001 WWTP SLUDGE	3/17/08	10:20A					✓	✓						✓	✓	

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☑ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For _____ Months
(A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____

QC Requirements (Specify)

	Relinquished By	Date	Time	Received By	Date	Time
1	[redacted]	3-19-08	1015	[redacted]	3-19-08	1015
2	[redacted]	3-19-08	1630	[redacted]	3-19-08	1630
3						

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Wheeling Pittsburgh Steel

Lab Name: TESTAMERICA PITTSBURGH **Client ID:** MF-PJS-08001 WWTP SLUDGE

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C8C190322 001

Matrix: SOLID **Date Received:** 3/19/2008

Date Sampled: 3/7/2008 10:20AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
SW846	6010B	*TCLP Leachate / Acid Digestion*					TestAmerica Pittsburgh	
Barium		ND	mg/L	0.00027	10.0	1	3/24/2008 / 3/24/2008 14:22	DB
Selenium		ND	mg/L	0.015	0.25	1	3/24/2008 / 3/24/2008 14:22	DB
Arsenic		ND	mg/L	0.080	2.5	5	3/24/2008 / 3/24/2008 14:49	DB
Lead		ND	mg/L	0.065	2.5	5	3/24/2008 / 3/24/2008 14:49	DB
Silver		ND	mg/L	0.012	2.5	5	3/24/2008 / 3/24/2008 14:49	DB
Chromium		ND	mg/L	0.0055	2.5	5	3/24/2008 / 3/24/2008 14:49	DB
Cadmium		ND	mg/L	0.0062	0.50	5	3/24/2008 / 3/24/2008 14:49	DB
SW846	7470A	*TCLP Leachate / Mercury Preparation*					TestAmerica Pittsburgh	
Mercury		ND	mg/L	0.000055	0.00020	1	3/21/2008 / 3/2[illegible]/2008 17:30	JS
MCAWW	160.3 MOD	*Total Residue as Percent Solids*					TestAmerica Pittsburgh	
Percent Solids		49.7	%	0.0	1.0	1	3/20/2008 / 3/2[illegible]/2008 08:01	NC

TESTAMERICA PITTSBURGH *Results per sample*

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B" Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name: TESTAMERICA PITTSBURGH **Client ID:** INTRA-LAB QC

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C8C190322 001

Matrix: SOLID

Analyses	DUP	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
MCAWW	160.3 MOD	*Total Residue as Percent Solids*			TestAmerica Pittsburgh					
Percent Solids		55.5	%	1.0	1	3/21/2008	NC			2.1/20

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*TCLP Leachate / Acid Digestion*		TestAmerica Pittsburgh					
Arsenic				1	3/24/2008	DB	108	(80 - 120)	
Lead				1	3/24/2008	DB	99	(80 - 120)	
Barium				1	3/24/2008	DB	105	(80 - 120)	
Selenium				1	3/24/2008	DB	110	(80 - 120)	
Silver				1	3/24/2008	DB	102	(80 - 120)	
Chromium				1	3/24/2008	DB	103	(80 - 120)	
Cadmium				1	3/24/2008	DB	104	(80 - 120)	
SW846	7470A	*TCLP Leachate / Mercury Preparation*		TestAmerica Pittsburgh					
Mercury				1	3/21/2008	JS	103	(80 - 120)	

Wheeling Pittsburgh Steel

Lab Name:	TESTAMERICA PITTSBURGH	**Client ID:**	BLK - C3C200000134B
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C8C190322
Matrix:	SOLID		

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*TCLP Leachate / Acid Digestion*				TestAmerica Pittsburgh				
Arsenic		ND	mg/L	0.50	1	3/24/2008	DB			
Lead		ND	mg/L	0.50	1	3/24/2008	DB			
Barium		ND	mg/L	10.0	1	3/24/2008	DB			
Selenium		ND	mg/L	0.25	1	3/24/2008	DB			
Silver		ND	mg/L	0.50	1	3/24/2008	DB			
Chromium		ND	mg/L	0.50	1	3/24/2008	DB			
Cadmium		ND	mg/L	0.10	1	3/24/2008	DB			
Arsenic		ND	mg/L	0.50	1	3/24/2008	DB			
Lead		ND	mg/L	0.50	1	3/24/2008	DB			
Barium		ND	mg/L	10.0	1	3/24/2008	DB			
Selenium		ND	mg/L	0.25	1	3/24/2008	DB			
Silver		ND	mg/L	0.50	1	3/24/2008	DB			
Chromium		ND	mg/L	0.50	1	3/24/2008	DB			
Cadmium		ND	mg/L	0.10	1	3/24/2008	DB			
SW846	7470A	*TCLP Leachate / Mercury Preparation*				TestAmerica Pittsburgh				
Mercury		ND	mg/L	0.00020	1	3/21/2008	JS			
Mercury		ND	mg/L	0.00020	1	3/21/2008	JS			

MS/MSD Report

Analyses	Analysis Date	MS % Recovery	MSD % Recovery	QC Limits	RPD/ Limit
Laboratory QC ID: C8C190322001S TCLP Leachate / Acid Digestion					
Arsenic	3/24/2008	102	104	(75 - 125)	1.5/20
Barium	3/24/2008	96	96	(75 - 125)	0.25/20
Cadmium	3/24/2008	103	105	(75 - 125)	1.6/20
Chromium	3/24/2008	99	100	(75 - 125)	0.77/20
Lead	3/24/2008	100	101	(75 - 125)	1.2/20
Selenium	3/24/2008	107	107	(75 - 125)	0.53/20
Silver	3/24/2008	85	81	(75 - 125)	5.1/20
Laboratory QC ID: C8C190322001S TCLP Leachate / Mercury Preparation					
Mercury	3/21/2008	94	93	(75 - 125)	0.85/20

Att #5

STL

STL Pittsburgh
301 Alpha Drive
Pittsburgh, PA 15238

Tel: 412 963 7058 Fax: 412 963 2468
www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. MF-PJS-07003

Wheeling Pittsburgh Steel

Lot #: C7E090370

Pat Smith

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.

Christina M. Kovitch
Project Manager

May 21, 2007

STL

ACCREDITED IN ACCORDANCE WITH nelac

NELAC REPORTING:

The format and content of the attached report meets NELAC standards and guidelines except as noted in the narrative. The table below presents a summary of the certifications held by STL Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is Pennsylvania DEP. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State/Program	Certificate #	Program Types	STL Pittsburgh
NFESC	NA	NAVY	X
USACE	NA	Corps of Engineers	X
US Dept of Agriculture	(#S-46425)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW	X
		HW	X
California – nelac	04224CA	WW	X
		HW	X
Connecticut	(#PH-0688)	WW	X
		HW	X
Florida – nelac	(#E87660)	WW	X
		HW	X
Illinois – nelac	(#200005)	WW	X
		HW	X
Kansas – nelac	(#E-10350)	WW	X
		HW	X
Louisiana – nelac	(#93200)	WW	X
		HW	X
New Hampshire – nelac	(#203002)	WW	X
		--	--
New Jersey – nelac	(PA-005)	WW	X
		HW	X
New York – nelac	(#11182)	WW	X
		HW	X
North Carolina	(#434)	WW	X
		HW	X
Ohio Vap	(#CL0063)	WW	X
		HW	X
Pennsylvania - nelac	(#02-00416)	WW	X
		HW	X
South Carolina	(#89014001)	WW	X
		HW	X
Utah – nelac	(STLP)	WW	X
		HW	X
West Virginia	(#142)	WW	X
		HW	X
Wisconsin	998027800	WW	X
		HW	X

The codes utilized for program types are described below:

HW Hazardous Waste certification
WW Non-potable Water and/or Wastewater certification
X Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

Updated: 04/27/06

CASE NARRATIVE
Wheeling Pittsburgh Steel

LOT # C7E090370

Sample Receiving:
STL Pittsburgh received one sample on May 9, 2007. The cooler was received within the proper temperature range.

Client was notified that the chloride sample could not be analyzed due to the matrix of the sample during prep for analysis. The analyst performed a DI Leach on the sample as well as a GPC clean up neither would work for analysis. We suggested a Bomb Chloride on the sample and client said to proceed. This sample for Bomb Chloride will be relogged and reported out STL Pittsburgh Lot C7C180271.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

Metals:
The sample was over the instruments linear range for aluminum and zinc and required a dilution. This sample was also analyzed at a dilution for lead due to inter-element corrections associated with aluminum.

TCLP Metals:
The sample was analyzed at a dilution for arsenic, lead, silver, chromium, and cadmium due to zinc saturation.

General Chemistry:
The sample was analyzed at a dilution for ammonia.

METHODS SUMMARY

C7E090370

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 1311/3010
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A	SW846 1311/7470
Nitrogen, Ammonia	MCAWW 350.1	distillation,m
Total Residue as Percent Solids	MCAWW 160.3 MOD	MCAWW 160.3 MOD
Trace Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 3050B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

Chain of Custody Record

SEVERN TRENT **STL**

Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
WPSC	C. ICOVITON	5/8/07	312076
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page** 1 of 1
City MARIETTA **State** OH **Zip Code** 45750	**Site Contact**	**Lab Contact**	
Project Name and Location (State)	**Carrier/Waybill Number**		
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	WASTE	Containers & Preservatives: Unpres.	H_2SO_4	HNO_3	HCl	NaOH	ZnAc/NaOH	Analysis (Attach list if more space is needed): TCLP & RCRA METALS	% SOLIDS	TOTAL Zn	TOTAL Al	TOTAL Fe	TOTAL Pb	AMMONIA	CHLORIDE	Special Instructions/ Conditions of Receipt
MF-PJS-07003 GALVANIZING BAGHOUSE DUST	5/8/07	1:45P					✓	✓						✓	✓	✓	✓	✓	✓	✓	✓	
~~MF-PJS-07004~~																						

Possible Hazard Identification

☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☑ Unknown

Sample Disposal

☐ Return To Client ☑ Disposal By Lab ☐ Archive For _____ Months

(A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required

☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____

QC Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By	5/9/07	9:55A	1. Received By	5-9-07	0955
2. Relinquished By	5-9-07	1555	2. Received By	5/9/07	~~00~~ 1555
3. Relinquished By			3. Received By		

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH

Client ID: MF-PJS-07003 GALVANIZING BAGHOUSE DUST

Client Name: Wheeling Pittsburgh Steel

Lab ID: C7E090370 001

Matrix: SOLID

Date Received: 5/9/2007

Date Sampled: 5/4/2007 1:15PM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*					STL Pittsburgh	
Iron		302	mg/kg	3.0	10.2	1	5/11/2007 / 5/15/2007 02:26	RG
Zinc		36200	mg/kg	35.2	203	100	5/11/2007 / 5/15/2007 17:11	RG
Lead		13.9	mg/kg	0.80	1.5	5	5/11/2007 / 5/15/2007 17:00	RG
Aluminum		137000	mg/kg	7.2	102	5	5/11/2007 / 5/15/2007 17:00	RG
SW846	6010B	*TCLP Leachate / Acid Digestion*					STL Pittsburgh	
Barium		ND	mg/L	0.00027	10.0	1	5/12/2007 / 5/14/2007 15:58	DB
Selenium		ND	mg/L	0.015	0.25	1	5/12/2007 / 5/14/2007 15:58	DB
Arsenic		ND	mg/L	0.40	5.0	25	5/12/2007 / 5/16/2007 11:41	DB
Lead		ND	mg/L	0.33	5.0	25	5/12/2007 / 5/16/2007 11:41	DB
Silver		ND	mg/L	0.062	5.0	25	5/12/2007 / 5/16/2007 11:41	DB
Chromium		ND	mg/L	0.028	5.0	25	5/12/2007 / 5/16/2007 11:41	DB
Cadmium		ND	mg/L	0.031	1.0	25	5/12/2007 / 5/16/2007 11:41	DB
SW846	7470A	*TCLP Leachate / Mercury Preparation*					STL Pittsburgh	
Mercury		ND	mg/L	0.000055	0.00020	1	5/14/2007 / 5/14/2007 18:45	JS
MCAWW	350.1	*distillation,midi*					STL Pittsburgh	
Ammonia Nitrogen		558	mg/kg	4.6	254	5	5/12/2007 / 5/15/2007 00:00	MW
MCAWW	160.3 MOD	*Total Residue as Percent Solids*					STL Pittsburgh	
Percent Solids		98.4	%	0.0	1.0	1	5/9/2007 / 5/10/2007 10:32	WB

STL PITTSBURGH

Results per sample

Notes:

ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** INTRA-LAB QC

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C7E090370 001

Matrix: SOLID

Analyses	DUP	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
MCAWW	160.3 MOD	*Total Residue as Percent Solids*			STL Pittsburgh					
Percent Solids		23.1	%	1.0	1	5/10/2007	WB			0.38/20

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*		STL Pittsburgh					
Iron				1	5/15/2007	RG	100	(80 - 120)	
Lead				1	5/15/2007	RG	96	(80 - 120)	
Zinc				1	5/15/2007	RG	100	(80 - 120)	
Aluminum				1	5/15/2007	RG	97	(80 - 120)	
SW846	6010B	*TCLP Leachate / Acid Digestion*		STL Pittsburgh					
Arsenic				1	5/14/2007	DB	112	(80 - 120)	
Lead				1	5/14/2007	DB	95	(80 - 120)	
Barium				1	5/14/2007	DB	95	(80 - 120)	
Selenium				1	5/14/2007	DB	107	(80 - 120)	
Silver				1	5/14/2007	DB	96	(80 - 120)	
Chromium				1	5/14/2007	DB	96	(80 - 120)	
Cadmium				1	5/14/2007	DB	87	(80 - 120)	
SW846	7470A	*TCLP Leachate / Mercury Preparation*		STL Pittsburgh					
Mercury				1	5/14/2007	JS	103	(80 - 120)	

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
MCAWW	350.1	*distillation,midi*		STL Pittsburgh					
Ammonia Nitrogen				1	5/15/2007	MW	90	(90 - 110)	

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH
Client Name: Wheeling Pittsburgh Steel
Matrix: SOLID

Client ID: DUPLICATE CHECK
Lab ID: C7E090370

Analyses	LCSD	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*			STL Pittsburgh					
Iron		99.8	mg/kg	10.0	1	5/15/2007	RG	100	(80 - 120)	0.25/20
Lead		47.7	mg/kg	0.30	1	5/15/2007	RG	95	(80 - 120)	0.56/20
Zinc		50.1	mg/kg	2.0	1	5/15/2007	RG	100	(80 - 120)	0.52/20
Aluminum		193	mg/kg	20.0	1	5/15/2007	RG	97	(80 - 120)	0.63/20

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*			STL Pittsburgh					
Iron		ND	mg/kg	10.0	1	5/15/2007	RG			
Lead		ND	mg/kg	0.30	1	5/15/2007	RG			
Zinc		ND	mg/kg	2.0	1	5/15/2007	RG			
Aluminum		ND	mg/kg	20.0	1	5/15/2007	RG			
SW846	6010B	*TCLP Leachate / Acid Digestion*			STL Pittsburgh					
Arsenic		ND	mg/L	0.50	1	5/14/2007	DB			
Lead		ND	mg/L	0.50	1	5/14/2007	DB			
Barium		ND	mg/L	10.0	1	5/14/2007	DB			
Selenium		ND	mg/L	0.25	1	5/14/2007	DB			
Silver		ND	mg/L	0.50	1	5/14/2007	DB			
Chromium		ND	mg/L	0.50	1	5/14/2007	DB			
Cadmium		ND	mg/L	0.10	1	5/14/2007	DB			
Arsenic		ND	mg/L	0.20	1	5/14/2007	DB			
Lead		ND	mg/L	0.20	1	5/14/2007	DB			
Barium		ND	mg/L	10.0	1	5/14/2007	DB			
Selenium		ND	mg/L	0.25	1	5/14/2007	DB			
Silver		ND	mg/L	0.20	1	5/14/2007	DB			
Chromium		ND	mg/L	0.20	1	5/14/2007	DB			
Cadmium		ND	mg/L	0.040	1	5/14/2007	DB			
SW846	7470A	*TCLP Leachate / Mercury Preparation*			STL Pittsburgh					
Mercury		ND	mg/L	0.00020	1	5/14/2007	JS			
Mercury		ND	mg/L	0.00020	1	5/14/2007	JS			

Wheeling Pittsburgh Steel

Lab Name:	STL PITTSBURGH	**Client ID:**	BLK - C7E120000101B
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C7E090370
Matrix:	SOLID		

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
MCAWW	350.1	*distillation,midi*			STL Pittsburgh					
Ammonia Nitrogen		ND	mg/kg	50.0	1	5/15/2007	MW			

MS/MSD Report

Analyses	Analysis Date	MS % Recovery		MSD % Recovery		QC Limits	RPD/ Limit
Laboratory QC ID: C7E090365001S TCLP Leachate / Acid Digestion							
Arsenic	5/14/2007	99		101		(75 - 125)	1.6/20
Barium	5/14/2007	89		91		(75 - 125)	2.6/20
Cadmium	5/14/2007	98		99		(75 - 125)	0.93/20
Chromium	5/14/2007	92		94		(75 - 125)	1.9/20
Lead	5/14/2007	93		95		(75 - 125)	1.3/20
Selenium	5/14/2007	100		105		(75 - 125)	4.9/20
Silver	5/14/2007	55	N	58	N	(75 - 125)	6.1/20
Laboratory QC ID: C7E090353001S TCLP Leachate / Mercury Preparation							
Mercury	5/14/2007	93		93		(75 - 125)	0.21/20
Laboratory QC ID: C7E110250004S distillation,midi							
Ammonia Nitrogen	5/15/2007	49	N	137	N *	(90 - 110)	27/20

STL Pittsburgh
301 Alpha Drive
Pittsburgh, PA 15238

Tel: 412 963 7058 Fax: 412 963 2468
www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. MF-PJS-07003

Wheeling Pittsburgh Steel

Lot #: C7E180271

Pat Smith

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.

Christina M. Kovitch
Project Manager

June 8, 2007

STL

ACCREDITED IN ACCORDANCE WITH

NELAC REPORTING:

The format and content of the attached report meets NELAC standards and guidelines except as noted in the narrative. The table below presents a summary of the certifications held by STL Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is Pennsylvania DEP. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State/Program	Certificate #	Program Types	STL Pittsburgh
NFESC	NA	NAVY	X
USACE	NA	Corps of Engineers	X
US Dept of Agriculture	(#S-46425)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW HW	X X
California – nelac	04224CA	WW HW	X X
Connecticut	(#PH-0688)	WW HW	X X
Florida – nelac	(#E87660)	WW HW	X X
Illinois – nelac	(#200005)	WW HW	X X
Kansas – nelac	(#E-10350)	WW HW	X X
Louisiana – nelac	(#93200)	WW HW	X X
New Hampshire – nelac	(#203002)	WW –	X –
New Jersey – nelac	(PA-005)	WW HW	X X
New York – nelac	(#11182)	WW HW	X X
North Carolina	(#434)	WW HW	X X
Ohio Vap	(#CL0063)	WW HW	X X
Pennsylvania - nelac	(#02-00416)	WW HW	X X
South Carolina	(#89014001)	WW HW	X X
Utah – nelac	(STLP)	WW HW	X X
West Virginia	(#142)	WW HW	X X
Wisconsin	998027800	WW HW	X X

The codes utilized for program types are described below:

HW Hazardous Waste certification
WW Non-potable Water and/or Wastewater certification
X Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

Updated: 04/27/06

CASE NARRATIVE
Wheeling Pittsburgh Steel

LOT # C7E180271

Sample Receiving:
STL Pittsburgh received one sample on May 18, 2007. The cooler was received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

Client was notified that the chloride sample could not be analyzed due to the matrix of the sample during prep for analysis. The analyst performed a DI Leach on the sample as well as a GPC clean up neither would work for analysis. We suggested a Bomb Chloride on the sample and client said to proceed. This sample for Bomb Chloride will be relogged and reported out STL Pittsburgh Lot C7C180271.

General Chemistry:
The STL Buffalo,NY Laboratory analyzed the Bomb Chloride. All results are included in the report.

C7E180271

Chain of Custody Record

STL
Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client: WPSC	Project Manager: C. KOVITCH	Date: 5/8/07	Chain of Custody Number: 312076
Address	Telephone Number (Area Code)/Fax Number	Lab Number	Page 1 of 1
City: MANSFIELD State: OH Zip Code: 43935	Site Contact	Lab Contact	
Project Name and Location (State)	Carrier/Waybill Number		
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Waste	Containers & Preservatives: Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	Analysis: TCLP & RCRA Disposal	% Solids	Total Zn	Total Al	Total Fe	Total Pb	Ammonia	Chloride	Special Instructions/ Conditions of Receipt
MF-PJS-07003 GALVANIZING BAGHOUSE DUST	5/8/07	1:45P					✓	✓						✓	✓	✓	✓	✓	✓	✓	✓	
~~MF-PJS-07004~~																						

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☑ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____

QC Requirements (Specify)

1. Relinquished By: [signature]	Date: 5/9/07	Time: 9:55A	1. Received By: [signature]	Date: 5-9-07	Time: 0955
2. Relinquished By: [signature]	Date: 5-9-07	Time: 1555	2. Received By: Patricia R Faust	Date: 5/9/07	Time: ~~0~~ 1555
3. Relinquished By	Date	Time	3. Received By	Date	Time

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

1/10

STL

STL Buffalo
10 Hazelwood Drive, Suite 106
Amherst, NY 14228

Tel: 716 691 2600 Fax: 716 691 7991
www.stl-inc.com

ANALYTICAL REPORT

Job#: A07-5488

STL Project#: NY0A8523
SDG#: 180271
Site Name: STL Pittsburgh
Task: BTU / Chloride

Ms. Chris Kovitch
STL Pittsburgh
301 Alpha Drive; RIDC Park
Pittsburgh, PA 15238

STL Buffalo

Sally Hoffman
Project Manager

05/24/2007

[redacted]

STL Buffalo
Current Certifications

As of 5/16/2007

STATE	Program	Cert # / Lab ID
Arkansas	SDWA, CWA, RCRA, SOIL	88-0686
California	NELAP CWA, RCRA	01169CA
Connecticut	SDWA, CWA, RCRA, SOIL	PH-0568
Florida	NELAP CWA, RCRA	E87672
Georgia	SDWA,NELAP CWA, RCRA	956
Illinois	NELAP SDWA, CWA, RCRA	200003
Iowa	SW/CS	374
Kansas	NELAP SDWA, CWA, RCRA	E-10187
Kentucky	SDWA	90029
Kentucky UST	UST	30
Louisiana	NELAP CWA, RCRA	2031
Maine	SDWA, CWA	NY0044
Maryland	SDWA	294
Massachusetts	SDWA, CWA	M-NY044
Michigan	SDWA	9937
Minnesota	SDWA,CWA, RCRA	036-999-337
New Hampshire	NELAP SDWA, CWA	233701
New Jersey	NELAP SDWA, CWA, RCRA	NY455
New York	NELAP AIR, SDWA, CWA, RCRA,CLP	10026
Oklahoma	CWA, RCRA	9421
Pennsylvania	NELAP CWA,RCRA	68-00281
Tennessee	SDWA	02970
USDA	FOREIGN SOIL PERMIT	S-41579
USDOE	Department of Energy	DOECAP-STB
Virginia	SDWA	278
Washington	CWA,RCRA	C1677
West Virginia	CWA,RCRA	252
Wisconsin	CWA, RCRA	998310390

SAMPLE SUMMARY

LAB SAMPLE ID	CLIENT SAMPLE ID	MATRIX	SAMPLED DATE	SAMPLED TIME	RECEIVED DATE	RECEIVED TIME
A7548801	MF-PJS-07003	SOTHER	05/04/2007		05/19/2007	09:20

METHODS SUMMARY

Job#: A07-5488

STL Project#: NY0A8523
SDG#: 180271
Site Name: STL Pittsburgh

PARAMETER	ANALYTICAL METHOD
Heat of Combustion	ASTM D-240-76
Percent Chlorine	ASTM D-808-81

References:

ASTM "Annual Book of ASTM Standards", American Society for Testing and Materials, Philadelphia, PA.

SDG NARRATIVE

Job#: A07-5488

STL Project#: NY0A8523
SDG#: 180271
Site Name: STL Pittsburgh

General Comments

The enclosed data may or may not have been reported utilizing data qualifiers (Q) as defined on the Data Comment Page.

Soil, sediment and sludge sample results are reported on "dry weight" basis unless otherwise noted in this data package.

According to 40CFR Part 136.3, pH, Chlorine Residual, Dissolved Oxygen, Sulfite, and Temperature analyses are to be performed immediately after aqueous sample collection. When these parameters are not indicated as field (e.g. pH-Field), they were not analyzed immediately, but as soon as possible after laboratory receipt.

Sample dilutions were performed as indicated on the attached Dilution Log. The rationale for dilution is specified by the 3-digit code and definition.

Sample Receipt Comments

A07-5488
Sample Cooler(s) were received at the following temperature(s); 2.0 °C
All samples were received in good condition.

Wet Chemistry Data

No deviations from protocol were encountered during the analytical procedures.

****

The results presented in this report relate only to the analytical testing and condition of the sample at receipt. This report pertains to only those samples actually tested. All pages of this report are integral parts of the analytical data. Therefore, this report should be reproduced only in its entirety.

STL

DATA QUALIFIER PAGE

These definitions are provided in the event the data in this report requires the use of one or more of the qualifiers. Not all qualifiers defined below are necessarily used in the accompanying data package.

ORGANIC DATA QUALIFIERS

ND or U	Indicates compound was analyzed for, but not detected.
J	Indicates an estimated value. This flag is used either when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed, or when the data indicates the presence of a compound that meets the identification criteria but the result is less than the sample quantitation limit but greater than zero.
C	This flag applies to pesticide results where the identification has been confirmed by GC/MS.
B	This flag is used when the analyte is found in the associated blank, as well as in the sample.
E	This flag identifies compounds whose concentrations exceed the calibration range of the instrument for that specific analysis.
D	This flag identifies all compounds identified in an analysis at the secondary dilution factor.
N	Indicates presumptive evidence of a compound. This flag is used only for tentatively identified compounds, where the identification is based on the Mass Spectral library search. It is applied to all TIC results.
P	This flag is used for CLP methodology only. For Pesticide/Aroclor target analytes, when a difference for detected concentrations between the two GC columns is greater than 25%, the lower of the two values is reported on the data page and flagged with a "P".
A	This flag indicates that a TIC is a suspected aldol-condensation product.
1	Indicates coelution.
*	Indicates analysis is not within the quality control limits.

INORGANIC DATA QUALIFIERS

ND or U	Indicates element was analyzed for, but not detected. Report with the detection limit value.
J or B	Indicates a value greater than or equal to the instrument detection limit, but less than the quantitation limit.
N	Indicates spike sample recovery is not within the quality control limits.
S	Indicates value determined by the Method of Standard Addition.
E	Indicates a value estimated or not reported due to the presence of interferences.
H	Indicates analytical holding time exceedance. The value obtained should be considered an estimate.
G	Indicates a value greater than or equal to the project reporting limit but less than the laboratory quantitation limit
*	Indicates the spike or duplicate analysis is not within the quality control limits.
+	Indicates the correlation coefficient for the Method of Standard Addition is less than 0.995.

Sample ID: MF-PJS-07003
Lab Sample ID: A7548801
Date Collected: 05/04/2007
Time Collected:

Date Received: 05/19/2007
Project No: NYOA8523
Client No: L11220
Site No:

Parameter	Result	Flag	Detection Limit	Units	Method	Date/Time Analyzed	Analyst
Wet Chemistry Analysis							
Heat of Combustion	ND		1000	BTU/LB	D-240-76	05/22/2007 14:00	RMM
Percent Chlorine	4.2		0	%	D-808-81	05/23/2007 15:34	RLG

STL Buffalo

Chronology and QC Summary Package

C7E180271

Date: 05/24/2007 15:34
Job No: A07-5488

BTU / CHLORIDE
SAMPLE CHRONOLOGY

Rept: AN1250
Page: 1

Lab ID	Sample ID	Lab	Analyte	Method	DF	% Dry	Sample wt/vol g/L	Sample Date	Receive Date	Analysis Date	ANL INI	AH	Matrix
A7548801	MF-PJS-07003	RECNY	Heat of Combustion	D-240-7	1.0	95.56		05/04/2007	05/19 09:20	05/22 14:00	RMM	Y	SOTHER
		RECNY	Percent Chlorine	D-808-8	1.0	95.56		05/04/2007	05/19 09:20	05/23 15:34	RLG	Y	SOTHER

AH = Analysis Holding Time Met
TH = TCLP Holding Time Met
NA = Not Applicable

ANL INI = Analyst Initials
DF = Dilution Factor

10/10

C7E180271

INTER-COMPANY LOG

COMMENTS:

Project Manager: Chris Kovitch

Project: MF-PJS-07003 Wheeling Pittsburgh Steel

Report Type: B Standard Report

Client: 7616 - Wheeling Pittsburgh Steel

RUSH

Date Received: 2007-05-18

Analytical Due Date: 2007-05-25

Report Due Date: 2007-05-25

WORK LOCATION: I3 **STL Buffalo**

SMP#: 1 CLIENT ID: MF-PJS-07003 DATE SAMPLED: 20070504 MATRIX: A SOLID

SAMPLE COMMENTS: BTU / Chloride / D240 ASTM

METHOD: Z0 NONE NONE ~~SOLID, BOMB Chloride (STL Buffalo)~~

EXTRACTION: 88 NO SAMPLE PREPARATION PERFORMED / QC TYPE: 01 STANDARD TEST SET

WORKORDER JW9WM1AA METAL: XX

The sample(s) listed on this form are being sent to your location for the specified analysis. If you have any questions, please contact the Project Manager listed above. PLEASE RETURN THE ORIGINAL SIGNED FORM WITH THE REPORT AT THE COMPLETION OF ANALYSIS.

Thank You

STL- Pittsburgh
Sample Receiving

RELINQUISHED BY: _____ DATE: 5/18/07

RECEIVED FOR LAB BY: _____ DATE: 5/19/07 0830

20°C

Att #6

STL Pittsburgh
301 Alpha Drive
Pittsburgh, PA 15238

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www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. MF-PJS-06008

Wheeling Pittsburgh Steel

Lot #: C6C060171

Pat Smith

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.

Christina M. Kovitch
Project Manager

March 15, 2006

SEVERN TRENT STL

ACCREDITED IN ACCORDANCE WITH nelac

NELAC REPORTING:

The format and content of the attached report meets NELAC standards and guidelines except as noted in the narrative. The table below presents a summary of the certifications held by STL Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is Pennsylvania DEP. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State Program	Certificate #	Program Types	STL Pittsburgh
NFESC	NA	NAVY	X
USACE	NA	Corps of Engineers	X
US Dept of Agriculture	(#S-46425)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW HW	X X
California – nelac	04224CA	WW HW	X X
Connecticut	(#PH-0688)	WW HW	X X
Florida – nelac	(#E87660)	WW HW	X X
Illinois – nelac	(#200005)	WW HW	X X
Kansas – nelac	(#E-10350)	WW HW	X X
Louisiana – nelac	(#93200)	WW HW	X X
New Hampshire – nelac	(#203002)	WW --	X --
New Jersey – nelac	(PA-005)	WW HW	X X
New York – nelac	(#11182)	WW HW	X X
North Carolina	(#434)	WW HW	X X
North Dakota	R-075	WW HW	X X
Ohio Vap	(#CL0063)	WW HW	X X
Pennsylvania - nelac	(#02-00416)	WW HW	X X
South Carolina	(#89014001)	WW HW	X X
Utah – nelac	(STLP)	WW HW	X X
West Virginia	(#142)	WW HW	X X
Wisconsin	998027800	WW HW	X X

The codes utilized for program types are described below:

HW	Hazardous Waste certification
WW	Non-potable Water and/or Wastewater certification
X	Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

CASE NARRATIVE
Wheeling Pitt

LOT # C6C060171

Sample Receiving:
STL Pittsburgh received one sample on March 6, 2006. The coolers were received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

GC/MS Volatiles:
Sample MF-PJS-06008 CHEM-TREAT WASTE had the 3rd internal standard area recover low and outside of criteria in both the initial and the reanalysis. The sample also foamed during the purge cycle. Both analyses will be reported.

PCBs:
Due to matrix effect, the sample was analyzed at a dilution. The surrogates were diluted out.

GRO:
The STL Pensacola, FL laboratory performed the GRO analysis. Their results are included at the end of the report.

DRO:
The STL Pensacola, FL laboratory performed the DRO analysis. Their results are included at the end of the report.

Metals:
The sample was analyzed at a dilution due to matrix interference.

For the matrix spike and matrix spike duplicate, arsenic, chromium, lead and zinc recoveries were not calculated due to the concentration of analyte in the sample being >4 times the concentration of spike added.

The MS/MSD recoveries were outside of the control limits for antimony and selenium. All associated results were flagged with an "N" qualifier.

The RPD between the matrix spike and matrix spike duplicate was outside control limits for copper.

The method blank had analytes detected at concentrations between the MDL and the reporting limit. The results were flagged with a "B" qualifier. Any sample associated with a method blank that had the same analyte detected had the result flagged with a "J" qualifier.

CASE NARRATIVE
Wheeling Pitt

LOT # C6C060171

TCLP Metals:
For the matrix spike and matrix spike duplicate, chromium and zinc recoveries were not calculated due to the concentration of analyte in the sample being >4 times the concentration of spike added.

General Chemistry:
The STL North Canton, OH laboratory performed the COD, TOX and n-hexane extractable material analyses. All results are included in the report.

The sample was received and analyzed outside of the holding time for pH.

The sample was analyzed at a dilution for ammonia and TOX.

The MS/MSD recoveries were outside of the control limits for hexavalent chromium. All associated results were flagged with an "N" qualifier.

METHODS SUMMARY

C6C060171

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Cyanide, Total	SW846 9012A	SW846 9012A
COD, DI Leachate	MCAWW 410.4	ASTM D 3987-85
Hexavalent Chromium	SW846 7196A	ASTM ASTM DI LE
Ignitability	SW846 SECTION 7	SW846 SECTION 7
ICP-MS (6020)	SW846 6020	
ICP-MS (6020)	SW846 6020	SW846 3050B
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A	SW846 1311/7470
N-Hexane Extractable Material (1664A)	CFR136A 1664A H	ASTM ASTM DI LE
Nitrogen, Ammonia	MCAWW 350.1	ASTM D3987-85
PCBs by SW-846 8082	SW846 8082	SW846 3541
Soil and Waste pH	SW846 9045C	SW846 9045C
Sulfides, Total 9030B/9034	SW846 9030B/903	SW846 9030B/903
Total Organic Carbon	MCAWW 415.1	ASTM D 3987-85
Total Organic Halogens	SW846 9020B	
Total Residue as Percent Solids	MCAWW 160.3 MOD	MCAWW 160.3 MOD
Volatile Organics by GC/MS	SW846 8260B	SW846 5030B/826
Volatile Residue (TVS)	MCAWW 160.4	MCAWW 160.4

References:

CFR136A "Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater", 40CFR, Part 136, Appendix A, October 26, 1984 and subsequent revisions.

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C6C060171

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
H0PE4	001	MF-PJS-06008 CHEM-TREAT WASTE	03/03/06	08:45

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

Chain of Custody Record

STL-4124 (0901)

SEVERN TRENT SERVICES — **Severn Trent Laboratories, Inc.**

Client: WPSC	Project Manager: C. KOVITCH	Date: 3/3/06	Chain of Custody Number: 174353
Address: COMMERCIAL AVENUE	Telephone Number (Area Code)/Fax Number:	Lab Number:	Page 1 of 1
City: MINGO JUNCTION · State: OH · Zip Code: 43938	Site Contact: · Lab Contact:		
Project Name and Location (State):	Carrier/Waybill Number:		
Contract/Purchase Order/Quote No.: 44924			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	WASTE	Containers & Preservatives: Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	
SN-PJS-06002 FERROUS CHLORIDE SOLUTION	3/2/06	8:00 AM		✓				✓						
YK-PJS-06007 FERROUS CHLORIDE SOLUTION	3/3/06	9:45 AM		✓				✓						
AL-PJS-06002 FERROUS CHLORIDE SOLUTION	3/2/06	11:30 A		✓				✓						
AIF-PJS-06008 CHEM-TREAT WASTE	3/3/06	8:45 AM					✓	✓						

Analysis (Attach list if more space is needed)

Sample I.D.	~~[struck out]~~	TOTAL Fe by MS	TOTAL F	TOTAL Cl-	PCBs	% SOLIDS	ASTM D3987-85	(TOTAL SOLIDS, O&G, HEX Cr, TDS, COD,	TOX, AMMONIA-N)	TCLP (8 METALS + Ni, Sb, Cu, Tl, Zn)	TOTAL METALS (As, Ba, Cd, Cr, Pb,	Hg, Ni, Sb, Se, Ag,	Cu, Mo, Tl, Zn	TOTAL VOLATILE SOLIDS	pH	TOTAL CN	TPH (DRO/GRO)	BTEX	IGNITABILITY	Special Instructions/ Conditions of Receipt
SN-PJS-06002		✓	✓	✓																
YK-PJS-06007		✓	✓	✓																
AL-PJS-06002		✓	✓	✓																
AIF-PJS-06008					✓	✓	✓			✓	✓			✓	✓	✓	✓	✓	✓	2 JI / 1 JV

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☑ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For ____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other____

QC Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By: [signature]	3/3/06	11:11	1. Received By: Gary L Doak	3-3-06	11:11
2. Relinquished By: Gary L Doak	3-6-06	13:20	2. Received By: Gary L Doak	3-6-06	13:20
3. Relinquished By:			3. Received By:		

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** MF-PJS-06008 CHEM-TREAT WASTE

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C6C060171 001

Matrix: SOLID **Date Received:** 3/6/2006

Date Sampled: 3/3/2006 8:45AM

SW846	6020	*Acid Digestion of Sediments, Sludges, Soils*					STL Pittsburgh			
Antimony		1.4	mg/kg	0.048	1.3	5	3/7/2006	/	3/11/2006 21:17	BR
Arsenic		35.6	mg/kg	0.079	0.64	5	3/7/2006	/	3/11/2006 21:17	BR
Lead		128	mg/kg	0.017	0.64	5	3/7/2006	/	3/11/2006 21:17	BR
Molybdenum		5.6	mg/kg	0.27	3.2	5	3/7/2006	/	3/11/2006 21:17	BR
Barium		52.2	mg/kg	0.039	6.4	5	3/7/2006	/	3/11/2006 21:17	BR
Nickel		11.6	mg/kg	0.13	0.64	5	3/7/2006	/	3/11/2006 21:17	BR
Selenium		ND	mg/kg	0.12	3.2	5	3/7/2006	/	3/11/2006 21:17	BR
Silver		ND	mg/kg	0.20	0.64	5	3/7/2006	/	3/11/2006 21:17	BR
Thallium		6.3	mg/kg	0.037	0.64	5	3/7/2006	/	3/11/2006 21:17	BR
Zinc		13600	mg/kg	0.48	3.2	5	3/7/2006	/	3/11/2006 21:17	BR
Chromium		41500	mg/kg	0.18	1.3	5	3/7/2006	/	3/11/2006 21:17	BR
Cadmium		0.81	mg/kg	0.048	0.64	5	3/7/2006	/	3/11/2006 21:17	BR
Copper		39.1 J	mg/kg	0.053	1.3	5	3/7/2006	/	3/11/2006 21:17	BR

SW846	7470A	*TCLP Leachate / Mercury Preparation*					STL Pittsburgh			
Mercury		ND	mg/L	0.000048	0.00020	1	3/9/2006	/	3/9/2006 08:37	BAH

SW846	6020	*TCLP(1311) -> METALS, TOTAL*					STL Pittsburgh			
Antimony		ND	mg/L	0.00084	0.020	10	3/9/2006	/	3/13/2006 19:45	BR
Arsenic		0.015	mg/L	0.0012	0.010	10	3/9/2006	/	3/13/2006 19:45	BR
Lead		ND	mg/L	0.000026	0.010	10	3/9/2006	/	3/13/2006 19:45	BR
Barium		ND	mg/L	0.00061	0.10	10	3/9/2006	/	3/13/2006 19:45	BR
Nickel		0.052	mg/L	0.0020	0.010	10	3/9/2006	/	3/13/2006 19:45	BR
Selenium		ND	mg/L	0.0019	0.050	10	3/9/2006	/	3/13/2006 19:45	BR
Silver		ND	mg/L	0.0031	0.010	10	3/9/2006	/	3/13/2006 19:45	BR
Thallium		0.013	mg/L	0.000059	0.010	10	3/9/2006	/	3/13/2006 19:45	BR
Zinc		190	mg/L	0.0075	0.050	10	3/9/2006	/	3/13/2006 19:45	BR
Chromium		146	mg/L	0.0027	0.020	10	3/9/2006	/	3/13/2006 19:45	BR
Cadmium		ND	mg/L	0.00074	0.010	10	3/9/2006	/	3/13/2006 19:45	BR
Copper		0.12	mg/L	0.0011	0.020	10	3/9/2006	/	3/13/2006 19:45	BR

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** MF-PJS-06008 CHEM-TREAT WASTE

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C6C060171 001

Matrix: SOLID **Date Received:** 3/6/2006

Date Sampled: 3/3/2006 8:45AM

CFR136A	1664A HEM	*ASTM 18 HOUR DI LEACHATE PROCEDURE*							STL North Canton	
n-Hexane Extractable Material		ND	mg/L	1.2	5.0	1	3/13/2006	/ 3/13/2006	00:00	CT
SW846	7196A	*ASTM DI LEACHATE FOR HEX CHROME*							STL Pittsburgh	
Hexavalent Chromium		0.64	mg/L	0.0035	0.010	1	3/8/2006	/ 3/8/2006	13:10	JH
MCAWW	350.1	*DI Leachate*							STL Pittsburgh	
Ammonia Nitrogen		14.0	mg/L	0.18	0.50	5	3/13/2006	/ 3/14/2006	10:32	CLL
SW846	9012A	*Distillation procedure*							STL Pittsburgh	
Cyanide, Total		ND	mg/kg	0.28	0.64	1	3/9/2006	/ 3/13/2006	00:00	LM
SW846	SECTION 7.1.	*Ignitability*							STL Pittsburgh	
Ignitability		ND NO	No Units	--	--	1	3/8/2006	/ 3/8/2006	00:00	DB
SW846	9020B	*LEACHATE, DI (ASTM D3987-85) - 18 hour*							STL North Canton	
Total Organic Halogens		278	ug/L	70.0	150	5	3/13/2006	/ 3/13/2006	00:00	DEB
SW846	9045C	*pH - Non-Aqueous*							STL Pittsburgh	
pH		5.4	No Units			1	3/7/2006	/ 3/7/2006	11:39	JP
MCAWW	415.1	*Shake Extraction of Solid Waste With Water*							STL Pittsburgh	
TOC		3.9	mg/L	0.31	1.0	1	3/10/2006	/ 3/10/2006	00:00	JH
COD, DI Leachate		ND	mg/L	14.0	20.0	1	3/13/2006	/ 3/13/2006	00:00	JAK
SW846	9030B/9034	*Sulfides, Total*							STL Pittsburgh	
Total Sulfide		ND	mg/kg	15.8	12.9	1	3/7/2006	/ 3/8/2006	00:00	DB

STL PITTSBURGH *Results per sample*

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** MF-PJS-06008 CHEM-TREAT WASTE

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C6C060171 001

Matrix: SOLID **Date Received:** 3/6/2006

Date Sampled: 3/3/2006 8:45AM

MCAWW	160.3 MOD	*Total Residue as Percent Solids*					STL Pittsburgh				
Percent Solids		77.6	%	0.0	1.0	1	3/7/2006	/	3/8/2006	04:47	MW
MCAWW	160.4	*Volatile Residue (TVS)*					STL Pittsburgh				
Total Volatile Solids (TVS)		24.8	%	0.50	0.50	1	3/9/2006	/	3/10/2006	00:00	MW

STL PITTSBURGH *Results per sample*

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name:	STL PITTSBURGH	**Client ID:**	MF-PJS-06008
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C6C060171 001
Matrix:	SOLID		

Analyses	DUP	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	SECTION 7.1.	*Ignitability*			STL Pittsburgh					
Ignitability		ND	No Units	--	1	3/8/2006	DB	NO		0/0.0
SW846	9045C	*pH - Non-Aqueous*			STL Pittsburgh					
pH		5.2	No Units		1	3/7/2006	JP			5.3/2.0
MCAWW	160.3 MOD	*Total Residue as Percent Solids*			STL Pittsburgh					
Percent Solids		87.1	%	1.0	1	3/8/2006	MW			0.76/20
MCAWW	160.4	*Volatile Residue (TVS)*			STL Pittsburgh					
Total Volatile Solids (TVS		ND	%	0.50	1	3/10/2006	MW			11/20

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** CHECK SAMPLE

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C6C060171

Matrix: SOLID

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6020	*Acid Digestion of Sediments, Sludges, Soils*		STL Pittsburgh					
Antimony				1	3/11/2006	BR	87	(80 - 120)	
Arsenic				1	3/11/2006	BR	85	(80 - 120)	
Lead				1	3/11/2006	BR	94	(80 - 120)	
Molybdenum				1	3/11/2006	BR	92	(80 - 120)	
Barium				1	3/11/2006	BR	93	(80 - 120)	
Nickel				1	3/11/2006	BR	101	(80 - 120)	
Selenium				1	3/11/2006	BR	87	(80 - 120)	
Silver				1	3/11/2006	BR	101	(80 - 120)	
Thallium				1	3/11/2006	BR	95	(80 - 120)	
Zinc				1	3/11/2006	BR	83	(80 - 120)	
Chromium				1	3/11/2006	BR	105	(80 - 120)	
Cadmium				1	3/11/2006	BR	90	(80 - 120)	
Copper				1	3/11/2006	BR	100	(80 - 120)	
SW846	7470A	*TCLP Leachate / Mercury Preparation*		STL Pittsburgh					
Mercury				1	3/9/2006	BAH	101	(80 - 120)	
SW846	6020	*TCLP(1311) -> METALS, TOTAL*		STL Pittsburgh					
Antimony				1	3/13/2006	BR	93	(80 - 120)	
Arsenic				1	3/13/2006	BR	93	(80 - 120)	
Lead				1	3/13/2006	BR	104	(80 - 120)	
Barium				1	3/13/2006	BR	95	(80 - 120)	
Nickel				1	3/13/2006	BR	95	(80 - 120)	
Selenium				1	3/13/2006	BR	92	(80 - 120)	
Silver				1	3/13/2006	BR	94	(80 - 120)	
Thallium				1	3/13/2006	BR	105	(80 - 120)	
Zinc				1	3/13/2006	BR	80	(80 - 120)	
Chromium				1	3/13/2006	BR	93	(80 - 120)	
Cadmium				1	3/13/2006	BR	90	(80 - 120)	
Copper				1	3/13/2006	BR	93	(80 - 120)	

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** CHECK SAMPLE

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C6C060171

Matrix: SOLID

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
CFR136A	1664A HEM	*ASTM 18 HOUR DI LEACHATE PROCEDUR*		STL North Canton					
n-Hexane Extractable Mat				1	3/13/2006	CT	98	(79 - 114)	
SW846	7196A	*ASTM DI LEACHATE FOR HEX CHROME*		STL Pittsburgh					
Hexavalent Chromium				1	3/8/2006	JH	104	(80 - 120)	
MCAWW	350.1	*DI Leachate*		STL Pittsburgh					
Ammonia Nitrogen				1	3/14/2006	CLL	100	(90 - 110)	
SW846	9012A	*Distillation procedure*		STL Pittsburgh					
Cyanide, Total				1	3/13/2006	LM	106	(38 - 162)	
SW846	9020B	*LEACHATE, DI (ASTM D3987-85) - 18 hour*		STL North Canton					
Total Organic Halogens				1	3/13/2006	DEB	96	(52 - 139)	
SW846	9045C	*pH - Non-Aqueous*		STL Pittsburgh					
pH				1	3/7/2006	JP	100	(99 - 101)	
MCAWW	410.4	*Shake Extraction of Solid Waste With Water*		STL North Canton					
COD, DI Leachate				1	3/13/2006	JAK	97	(90 - 110)	
TOC				1	3/10/2006	JH	96	(80 - 120)	
SW846	9030B/9034	*Sulfides, Total*		STL Pittsburgh					
Total Sulfide				1	3/8/2006	DB	91	(75 - 125)	

Analyses	LCSD	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
CFR136A	1664A HEM	*ASTM 18 HOUR DI LEACHATE PROCEDUR*			STL North Canton					
n-Hexane Extractable Mat		40.0	mg/L	5.0	1	3/13/2006	CT	100	(79 - 114)	1.8/20
MCAWW	350.1	*DI Leachate*			STL Pittsburgh					
Ammonia Nitrogen		2.01	mg/L	0.10	1	3/14/2006	CLL	100	(90 - 110)	0.65/10
SW846	9020B	*LEACHATE, DI (ASTM D3987-85) - 18 hour*			STL North Canton					
Total Organic Halogens		946	ug/L	30.0	1	3/13/2006	DEB	95	(52 - 139)	1.1/20
MCAWW	410.4	*Shake Extraction of Solid Waste With Water*			STL North Canton					
COD, DI Leachate		125	mg/L	20.0	1	3/13/2006	JAK	92	(90 - 110)	5.9/20
TOC		19.1	mg/L	1.0	1	3/10/2006	JH	95	(80 - 120)	0.33/10

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH
Client Name: Wheeling Pittsburgh Steel
Matrix: SOLID

Client ID: BLK - C6C070000142B
Lab ID: C6C060171

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6020	*Acid Digestion of Sediments, Sludges, Soils*			STL Pittsburgh					
Antimony		ND	mg/kg	0.20	1	3/11/2006	BR			
Arsenic		ND	mg/kg	0.10	1	3/11/2006	BR			
Lead		ND	mg/kg	0.10	1	3/11/2006	BR			
Molybdenum		ND	mg/kg	0.50	1	3/11/2006	BR			
Barium		ND	mg/kg	1.0	1	3/11/2006	BR			
Nickel		ND	mg/kg	0.10	1	3/11/2006	BR			
Selenium		ND	mg/kg	0.50	1	3/11/2006	BR			
Silver		ND	mg/kg	0.10	1	3/11/2006	BR			
Thallium		ND	mg/kg	0.10	1	3/11/2006	BR			
Zinc		ND	mg/kg	0.50	1	3/11/2006	BR			
Chromium		ND	mg/kg	0.20	1	3/11/2006	BR			
Cadmium		ND	mg/kg	0.10	1	3/11/2006	BR			
Copper		0.31	mg/kg	0.20	1	3/11/2006	BR			
SW846	7470A	*TCLP Leachate / Mercury Preparation*			STL Pittsburgh					
Mercury		ND	mg/L	0.00020	1	3/9/2006	BAH			
Mercury		ND	mg/L	0.00020	1	3/9/2006	BAH			
SW846	6020	*TCLP(1311) -> METALS, TOTAL*			STL Pittsburgh					
Antimony		ND	mg/L	0.0020	1	3/13/2006	BR			
Arsenic		ND	mg/L	0.0010	1	3/13/2006	BR			
Lead		ND	mg/L	0.0010	1	3/13/2006	BR			
Barium		ND	mg/L	0.010	1	3/13/2006	BR			
Nickel		ND	mg/L	0.0010	1	3/13/2006	BR			
Selenium		ND	mg/L	0.0050	1	3/13/2006	BR			
Silver		ND	mg/L	0.0010	1	3/13/2006	BR			
Thallium		ND	mg/L	0.0010	1	3/13/2006	BR			
Zinc		ND	mg/L	0.0050	1	3/13/2006	BR			
Chromium		ND	mg/L	0.0020	1	3/13/2006	BR			
Cadmium		ND	mg/L	0.0010	1	3/13/2006	BR			
Copper		ND	mg/L	0.0020	1	3/13/2006	BR			
Antimony		ND	mg/L	0.0020	1	3/13/2006	BR			
Arsenic		ND	mg/L	0.0010	1	3/13/2006	BR			

Wheeling Pittsburgh Steel

Lab Name:	STL PITTSBURGH	**Client ID:**	BLK - C6C090000200B
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C6C060171
Matrix:	SOLID		

Analyses MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
Lead	ND	mg/L	0.0010	1	3/13/2006	BR			
Barium	ND	mg/L	0.010	1	3/13/2006	BR			
Nickel	ND	mg/L	0.0010	1	3/13/2006	BR			
Selenium	ND	mg/L	0.0050	1	3/13/2006	BR			
Silver	ND	mg/L	0.0010	1	3/13/2006	BR			
Thallium	ND	mg/L	0.0010	1	3/13/2006	BR			
Zinc	ND	mg/L	0.0050	1	3/13/2006	BR			
Chromium	ND	mg/L	0.0020	1	3/13/2006	BR			
Cadmium	ND	mg/L	0.0010	1	3/13/2006	BR			
Copper	ND	mg/L	0.0020	1	3/13/2006	BR			

Analyses MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
CFR136A 1664A HEM	*ASTM 18 HOUR DI LEACHATE PROCEDUR*			STL North Canton					
n-Hexane Extractable Mat	ND	mg/L	5.0	1	3/13/2006	CT			
SW846 7196A	*ASTM DI LEACHATE FOR HEX CHROME*			STL Pittsburgh					
Hexavalent Chromium	ND	mg/L	0.010	1	3/8/2006	JH			
Hexavalent Chromium	ND	mg/L	0.010	1	3/8/2006	JH			
MCAWW 350.1	*DI Leachate*			STL Pittsburgh					
Ammonia Nitrogen	ND	mg/L	0.10	1	3/14/2006	CLL			
Ammonia Nitrogen	ND	mg/L	0.10	1	3/14/2006	CLL			
SW846 9012A	*Distillation procedure*			STL Pittsburgh					
Cyanide, Total	ND	mg/kg	0.50	1	3/13/2006	LM			
SW846 9020B	*LEACHATE, DI (ASTM D3987-85) - 18 hour*			STL North Canton					
Total Organic Halogens	ND	ug/L	30.0	1	3/13/2006	DEB			
MCAWW 410.4	*Shake Extraction of Solid Waste With Water*			STL North Canton					
COD, DI Leachate	ND	mg/L	20.0	1	3/13/2006	JAK			
TOC	ND	mg/L	1.0	1	3/10/2006	JH			
TOC	ND	mg/L	1.0	1	3/10/2006	JH			
SW846 9030B/9034	*Sulfides, Total*			STL Pittsburgh					
Total Sulfide	ND	mg/kg	10.0	1	3/8/2006	DB			

MS/MSD Report

Analyses	Analysis Date	MS % Recovery		MSD % Recovery		QC Limits	RPD/ Limit
Laboratory QC ID: C6C060171001S Acid Digestion of Sediments, Sludges, Soils							
Antimony	3/11/2006	55	N	59	N	(75 - 125)	6.9/20
Arsenic	3/11/2006		NC		NC	(75 - 125)	/20
Barium	3/11/2006	93		105		(75 - 125)	9.5/20
Cadmium	3/11/2006	103		105		(75 - 125)	2.3/20
Chromium	3/11/2006		NC		NC	(75 - 125)	/20
Copper	3/11/2006	187	N	121	*	(75 - 125)	24/20
Lead	3/11/2006		NC		NC	(75 - 125)	/20
Molybdenum	3/11/2006	85		84		(75 - 125)	0.90/20
Nickel	3/11/2006	103		105		(75 - 125)	1.6/20
Selenium	3/11/2006	204	N	204	N	(75 - 125)	0.090/20
Silver	3/11/2006	95		106		(75 - 125)	11/20
Thallium	3/11/2006	91		92		(75 - 125)	0.21/20
Zinc	3/11/2006		NC		NC	(75 - 125)	/20
Laboratory QC ID: C6C060171001S TCLP Leachate / Mercury Preparation							
Mercury	3/9/2006	94		99		(75 - 125)	5.4/20
Laboratory QC ID: C6C060171001S TCLP(1311) -> METALS, TOTAL							
Arsenic	3/13/2006	100		97		(75 - 125)	1.9/20
Barium	3/13/2006	93		97		(75 - 125)	3.6/20
Cadmium	3/13/2006	95		98		(75 - 125)	1.9/20
Chromium	3/13/2006		NC		NC	(75 - 125)	/20
Copper	3/13/2006	98		105		(75 - 125)	4.7/20
Lead	3/13/2006	93		98		(75 - 125)	5.1/20
Nickel	3/13/2006	99		103		(75 - 125)	3.7/20
Selenium	3/13/2006	104		100		(75 - 125)	1.7/20
Silver	3/13/2006	88		93		(75 - 125)	6.5/20
Thallium	3/13/2006	93		97		(75 - 125)	3.6/20
Zinc	3/13/2006		NC		NC	(75 - 125)	/20

MS/MSD Report

Analyses	Analysis Date	MS % Recovery		MSD % Recovery		QC Limits	RPD/ Limit
Laboratory QC ID: C6C060171001S ASTM DI LEACHATE FOR HEX CHROME							
Hexavalent Chromium	3/8/2006	0.0	N	3.8	N	(75 - 125)	0.0/20
Laboratory QC ID: C6C010119001S Distillation procedure							
Cyanide, Total	3/13/2006	81		21	N *	(75 - 125)	109/20
Laboratory QC ID: C6C060171001S Shake Extraction of Solid Waste With Water							
COD, DI Leachate	3/13/2006	97		96		(90 - 110)	1.2/20
Laboratory QC ID: C6C060171001S Sulfides, Total							
Total Sulfide	3/8/2006	91		91		(75 - 125)	0.0/20

Wheeling Pittsburgh Steel

Lab Name:	STL PITTSBURGH	**Client ID:**	MF-PJS-06008 CHEM-TREAT WASTE
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C6C060171 001
Matrix:	SOLID	**Date Received:**	3/6/2006
		Date/Time Sampled:	3/3/2006 8:45AM

H0PE41A0 SW846 8082 *Automated Soxhlet*

Analyte	Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
Aroclor 1016	ND	ug/kg	340	430	10	3/8/2006 / 3/9/2006 22:21	AG
Aroclor 1221	ND	ug/kg	160	430	10	3/8/2006 / 3/9/2006 22:21	AG
Aroclor 1232	ND	ug/kg	200	430	10	3/8/2006 / 3/9/2006 22:21	AG
Aroclor 1242	ND	ug/kg	140	430	10	3/8/2006 / 3/9/2006 22:21	AG
Aroclor 1248	ND	ug/kg	160	430	10	3/8/2006 / 3/9/2006 22:21	AG
Aroclor 1254	ND	ug/kg	57	430	10	3/8/2006 / 3/9/2006 22:21	AG
Aroclor 1260	ND	ug/kg	47	430	10	3/8/2006 / 3/9/2006 22:21	AG
Decachlorobiphenyl	*surrogate % recovery*	NC DIL		*(23 - 141)*	10	3/8/2006 / 3/9/2006 22:21	AG
Tetrachloro-m-xylene	*surrogate % recovery*	NC DIL		*(31 - 127)*	10	3/8/2006 / 3/9/2006 22:21	AG

STL PITTSBURGH *Results per sample*

Notes:

ND - Not Detected at the Reporting Limit

PG - The % difference between the results from both columns is > 40%

J - Compound detected, but below the Reporting Limit (the value given is an estimate).

B - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH

Client ID: MF-PJS-06008 CHEM-TREAT WASTE

Client Name: Wheeling Pittsburgh Steel

Lab ID: C6C060171 001

Matrix: SOLID

Date Received: 3/6/2006

Date/Time Sampled: 3/3/2006 8:45AM

H0PE41AP SW846 8260B *Purge-and-Trap*

Analyte	Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
Benzene	ND	ug/kg	0.70	6.4	1	3/12/2006 / 3/12/2006 13:51	PJ
Ethylbenzene	ND	ug/kg	1.2	6.4	1	3/12/2006 / 3/12/2006 13:51	PJ
Toluene	ND	ug/kg	0.76	6.4	1	3/12/2006 / 3/12/2006 13:51	PJ
Xylenes (total)	ND	ug/kg	3.5	6.4	1	3/12/2006 / 3/12/2006 13:51	PJ
1,2-Dichloroethane-d4	*surrogate % recovery*		*103*	*(52 - 124)*	1	3/12/2006 / 3/12/2006 13:51	PJ
4-Bromofluorobenzene	*surrogate % recovery*		*82*	*(63 - 120)*	1	3/12/2006 / 3/12/2006 13:51	PJ
Dibromofluoromethane	*surrogate % recovery*		*105*	*(68 - 121)*	1	3/12/2006 / 3/12/2006 13:51	PJ
Toluene-d8	*surrogate % recovery*		*125*	*(72 - 127)*	1	3/12/2006 / 3/12/2006 13:51	PJ

Notes:

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Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH
Client ID: MF-PJS-06008 CHEM-TREAT WASTE

Client Name: Wheeling Pittsburgh Steel
Lab ID: C6C060171 001

Matrix: SOLID
Date Received: 3/6/2006

Date/Time Sampled: 3/3/2006 8:45AM

H0PE42AP SW846 8260B *Purge-and-Trap*

Analyte	Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
Benzene	ND	ug/kg	0.70	6.4	1	3/12/2006 / 3/12/2006 14:53	PJ
Ethylbenzene	ND	ug/kg	1.2	6.4	1	3/12/2006 / 3/12/2006 14:53	PJ
Toluene	ND	ug/kg	0.76	6.4	1	3/12/2006 / 3/12/2006 14:53	PJ
Xylenes (total)	ND	ug/kg	3.5	6.4	1	3/12/2006 / 3/12/2006 14:53	PJ
1,2-Dichloroethane-d4	*surrogate % recovery*		*78*	*(52 - 124)*	1	3/12/2006 / 3/12/2006 14:53	PJ
4-Bromofluorobenzene	*surrogate % recovery*		*73*	*(63 - 120)*	1	3/12/2006 / 3/12/2006 14:53	PJ
Dibromofluoromethane	*surrogate % recovery*		*87*	*(68 - 121)*	1	3/12/2006 / 3/12/2006 14:53	PJ
Toluene-d8	*surrogate % recovery*		*122*	*(72 - 127)*	1	3/12/2006 / 3/12/2006 14:53	PJ

Notes:
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Wheeling Pittsburgh Steel

Lab Name:	STL PITTSBURGH	**Client ID:**	BLK - C6C080000039B
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C6C060171
Matrix:	SOLID		

H0R9E1AA SW846 8082 *Automated Soxhlet*

Analyses	Result	Units	MDL	Reporting Limit	Dil Factor	Analysis Date	Analyst ID
Aroclor 1016	ND	ug/kg	26	33	1	3/9/2006	AG
Aroclor 1221	ND	ug/kg	13	33	1	3/9/2006	AG
Aroclor 1232	ND	ug/kg	16	33	1	3/9/2006	AG
Aroclor 1242	ND	ug/kg	11	33	1	3/9/2006	AG
Aroclor 1248	ND	ug/kg	12	33	1	3/9/2006	AG
Aroclor 1254	ND	ug/kg	4.4	33	1	3/9/2006	AG
Aroclor 1260	ND	ug/kg	3.7	33	1	3/9/2006	AG
Decachlorobiphenyl	*surrogate % recovery*		*87*	*(23 - 141)*	1	3/9/2006	AG
Tetrachloro-m-xylene	*surrogate % recovery*		*90*	*(31 - 127)*	1	3/9/2006	AG

STL PITTSBURGH

Results per sample

Notes:

ND - Not Detected at the Reporting Limit

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B - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	BLK - C6C120000021B
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C6C060171
Matrix:	SOLID		

H05EQ1AA SW846 8260B *Purge-and-Trap*

Analyses	Result	Units	MDL	Reporting Limit	Dil Factor	Analysis Date	Analyst ID
Benzene	ND	ug/kg	0.55	5.0	1	3/12/2006	PJ
Ethylbenzene	ND	ug/kg	0.93	5.0	1	3/12/2006	PJ
Toluene	ND	ug/kg	0.59	5.0	1	3/12/2006	PJ
Xylenes (total)	ND	ug/kg	2.7	5.0	1	3/12/2006	PJ
1,2-Dichloroethane-d4	*surrogate % recovery*		*86*	*(52 - 124)*	1	3/12/2006	PJ
4-Bromofluorobenzene	*surrogate % recovery*		*108*	*(63 - 120)*	1	3/12/2006	PJ
Dibromofluoromethane	*surrogate % recovery*		*95*	*(68 - 121)*	1	3/12/2006	PJ
Toluene-d8	*surrogate % recovery*		*113*	*(72 - 127)*	1	3/12/2006	PJ

Notes:

ND - Not Detected at the Reporting Limit

PG - The % difference between the results from both columns is > 40%

J - Compound detected, but below the Reporting Limit (the value given is an estimate).

B - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

CHECK SAMPLE

Lab Name: STL PITTSBURGH **Lab ID:** C6C060171

Matrix: SOLID

H0R9E1AC SW846 8082 *Automated Soxhlet*

Analyses	Percent Recovery	Limits		Analysis Date	Analyst ID
Aroclor 1016	*75*	*(49 - 122)*		3/9/2006	AG
Aroclor 1260	*110*	*(51 - 127)*		3/9/2006	AG
Decachlorobiphenyl	*89*	*(23 - 141)*	*surrogate percent recovery*	3/9/2006	AG
Tetrachloro-m-xylene	*83*	*(31 - 127)*	*surrogate percent recovery*	3/9/2006	AG

STL PITTSBURGH *Results per sample*

Notes:

ND - Not Detected at the Reporting Limit

PG - The % difference between the results from both columns is > 40%

J - Compound detected, but below the Reporting Limit (the value given is an estimate).

B - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

CHECK SAMPLE

Lab Name: STL PITTSBURGH **Lab ID:** C6C060171

Matrix: SOLID

H05EQ1AC SW846 8260B *Purge-and-Trap*

Analyses	Percent Recovery	Limits		Analysis Date	Analyst ID
1,1-Dichloroethene	79	(63 - 126)		3/12/2006	PJ
Benzene	74	(74 - 120)		3/12/2006	PJ
Chlorobenzene	80	(77 - 120)		3/12/2006	PJ
Toluene	88	(75 - 120)		3/12/2006	PJ
Trichloroethene	78	(73 - 120)		3/12/2006	PJ
1,2-Dichloroethane-d4	71	(52 - 124)	surrogate percent recovery	3/12/2006	PJ
4-Bromofluorobenzene	97	(63 - 120)	surrogate percent recovery	3/12/2006	PJ
Dibromofluoromethane	82	(68 - 121)	surrogate percent recovery	3/12/2006	PJ
Toluene-d8	106	(72 - 127)	surrogate percent recovery	3/12/2006	PJ

STL PITTSBURGH *Results per sample*

Notes:

ND - Not Detected at the Reporting Limit

PG - The % difference between the results from both columns is > 40%

J - Compound detected, but below the Reporting Limit (the value given is an estimate).

B - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

MS/MSD Report

Analyses	Analysis Date	MS % Recovery	MSD % Recovery	QC Limits	RPD/ Limit
Laboratory QC ID: C6C020143001S Automated Soxhlet					
Aroclor 1016	3/9/2006	103	101	(26 - 144)	2.5/39
Aroclor 1260	3/9/2006	93	96	(37 - 138)	2.1/33
Decachlorobiphenyl	3/9/2006	104	99	(23 - 141)	4.8/
Tetrachloro-m-xylene	3/9/2006	99	102	(31 - 127)	3.4/
Laboratory QC ID: C6C020260002S Purge-and-Trap					
1,1-Dichloroethene	3/12/2006	71	77	(61 - 138)	7.5/33
1,2-Dichloroethane-d4	3/12/2006	80	73	(52 - 124)	9.2/
4-Bromofluorobenzene	3/12/2006	102	106	(63 - 120)	4.3/
Benzene	3/12/2006	69	71	(64 - 132)	3.0/27
Chlorobenzene	3/12/2006	72	76	(61 - 133)	5.2/25
Dibromofluoromethane	3/12/2006	88	86	(68 - 121)	3.1/
Toluene	3/12/2006	76	81	(60 - 134)	6.8/26
Toluene-d8	3/12/2006	102	106	(72 - 127)	3.9/
Trichloroethene	3/12/2006	70	74	(52 - 143)	6.0/26

ANALYTICAL REPORT

Job Number: 400-9745-1

Job Description: C6C060171 Wheeling Pitt Steel

For:

Severn Trent Laboratories, Inc.
301 Alpha Drive
RIDC Park
Pittsburgh, PA 15238

Attention: Ms. Chris Kovitch

Rick Hayes
Project Manager I
rhayes@stl-inc.com
03/14/2006

METHOD SUMMARY

Client: Severn Trent Laboratories, Inc. Job Number: 400-9745-1

Description	Lab Location	Method	Preparation Method
Matrix: Solid			
GRO by 8015M	STL-PEN	SW846 8015M	
Closed System Purge & Trap/Field Preservation	STL-PEN		SW846 5035
Nonhalogenated Organics using GC/FID -Modified (Diesel Range Organics)	STL-PEN	SW846 8015B	
Ultrasonic Extraction	STL-PEN		SW846 3550B
Percent Moisture	STL-PEN	EPA 160.3	

LAB REFERENCES:

STL-PEN = STL-Pensacola

METHOD REFERENCES:

EPA - US Environmental Protection Agency

SW846 - "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

METHOD / ANALYST SUMMARY

Client: Severn Trent Laboratories, Inc. Job Number: 400-9745-1

Method	Analyst	Analyst ID
SW846 8015M	Potts, Charles	CP
SW846 8015B	Enfinger, Isabel	IE
EPA 160.3	Boone, Shannon	SB

SAMPLE SUMMARY

Client: Severn Trent Laboratories, Inc. Job Number: 400-9745-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
400-9745-1	MF-PJS-06008 CHEM-TREAT WASTE	Solid	03/03/2006 0000	03/07/2006 0855

SAMPLE RESULTS

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

Client Sample ID: **MF-PJS-06008 CHEM-TREAT WASTE**

Lab Sample ID: 400-9745-1
Client Matrix: Solid % Moisture: 2.1

Date Sampled: 03/03/2006 0000
Date Received: 03/07/2006 0855

8015M GRO by 8015M

Method: 8015M
Preparation: 5035
Dilution: 1.0
Date Analyzed: 03/09/2006 1353
Date Prepared: 03/09/2006 0952

Analysis Batch: 400-22790
Prep Batch: 400-22791

Instrument ID: GC/PID/FID
Lab File ID: B030906.D
Initial Weight/Volume: 5.01 g
Final Weight/Volume: 5 mL
Injection Volume:
Column ID: PRIMARY

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	RL
Gasoline Range Organics (GRO)-C6-C10		290		100

Surrogate	%Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	129	70 - 130

Client: Severn Trent Laboratories, Inc. Job Number: 400-9745-1

Client Sample ID: MF-PJS-06008 CHEM-TREAT WASTE

Lab Sample ID: 400-9745-1 Date Sampled: 03/03/2006 0000
Client Matrix: Solid % Moisture: 2.1 Date Received: 03/07/2006 0855

8015B Nonhalogenated Organics using GC/FID -Modified (Diesel Range Organics)

Method: 8015B Analysis Batch: 400-22742 Instrument ID: GC/FID/FID
Preparation: 3550B Prep Batch: 400-22662 Lab File ID: 2601027.D
Dilution: 100 Initial Weight/Volume: 30.05 g
Date Analyzed: 03/09/2006 1632 Final Weight/Volume: 10 mL
Date Prepared: 03/09/2006 0759 Injection Volume:
Column ID: PRIMARY

Analyte	DryWt Corrected: Y	Result (mg/Kg)	Qualifier	RL
Diesel Range Organics [C10-C28]		56000		510

Surrogate	%Rec		Acceptance Limits
o-Terphenyl	2090	*	64 - 164

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

General Chemistry

Client Sample ID: **MF-PJS-06008 CHEM-TREAT WASTE**

Lab Sample ID: 400-9745-1
Client Matrix: Solid

Date Sampled: 03/03/2006 0000
Date Received: 03/07/2006 0855

Analyte	Result	Qual	Units	RL	Dil	Method
Percent Solids	98		Percent	0.10	1.0	160.3
	Anly Batch: 400-22570		Date Analyzed 03/07/2006 0000			

DATA REPORTING QUALIFIERS

Client: Severn Trent Laboratories, Inc. Job Number: 400-9745-1

Lab Section	Qualifier	Description
GC Semi VOA		
	*	LCS, LCSD, MS, MSD, MD, or Surrogate exceeds the control limits

QUALITY CONTROL RESULTS

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

QC Association Summary

Lab Sample ID	Client Sample ID	Client Matrix	Method	Prep Batch
GC VOA				
Prep Batch: 400-22791				
LCS 400-22791/2-A	Lab Control Spike	Solid	5035	
MB 400-22791/1-A	Method Blank	Solid	5035	
400-9745-1	MF-PJS-06008 CHEM-TREAT WASTE	Solid	5035	
400-9790-A-5-C MS	Matrix Spike	Solid	5035	
400-9790-A-5-D MSD	Matrix Spike Duplicate	Solid	5035	
Analysis Batch:400-22790				
LCS 400-22791/2-A	Lab Control Spike	Solid	8015M	400-22791
MB 400-22791/1-A	Method Blank	Solid	8015M	400-22791
400-9745-1	MF-PJS-06008 CHEM-TREAT WASTE	Solid	8015M	400-22791
400-9790-A-5-C MS	Matrix Spike	Solid	8015M	400-22791
400-9790-A-5-D MSD	Matrix Spike Duplicate	Solid	8015M	400-22791
GC Semi VOA				
Prep Batch: 400-22662				
LCS 400-22662/14-A	Lab Control Spike	Solid	3550B	
MB 400-22662/15-A	Method Blank	Solid	3550B	
400-9745-1	MF-PJS-06008 CHEM-TREAT WASTE	Solid	3550B	
400-9751-A-1-B MS	Matrix Spike	Solid	3550B	
400-9751-A-1-C MSD	Matrix Spike Duplicate	Solid	3550B	
Analysis Batch:400-22742				
LCS 400-22662/14-A	Lab Control Spike	Solid	8015B	400-22662
MB 400-22662/15-A	Method Blank	Solid	8015B	400-22662
400-9745-1	MF-PJS-06008 CHEM-TREAT WASTE	Solid	8015B	400-22662
400-9751-A-1-B MS	Matrix Spike	Solid	8015B	400-22662
400-9751-A-1-C MSD	Matrix Spike Duplicate	Solid	8015B	400-22662
General Chemistry				
Analysis Batch:400-22570				
400-9745-1	MF-PJS-06008 CHEM-TREAT WASTE	Solid	160.3	

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

Method Blank - Batch: 400-22791

Method: 8015M
Preparation: 5035

Lab Sample ID: MB 400-22791/1-A
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2006 1104
Date Prepared: 03/09/2006 0952

Analysis Batch: 400-22790
Prep Batch: 400-22791
Units: ug/Kg

Instrument ID: GC/PID/FID
Lab File ID: B030903.D
Initial Weight/Volume: 5 g
Final Weight/Volume: 5 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Result	Qual	RL
Gasoline Range Organics (GRO)-C6-C10	<100		100

Surrogate	% Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	102	70 - 130

Laboratory Control Sample - Batch: 400-22791

Method: 8015M
Preparation: 5035

Lab Sample ID: LCS 400-22791/2-A
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2006 0952
Date Prepared: 03/09/2006 0952

Analysis Batch: 400-22790
Prep Batch: 400-22791
Units: ug/Kg

Instrument ID: GC/PID/FID
Lab File ID: B030902.D
Initial Weight/Volume: 5 g
Final Weight/Volume: 5 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Gasoline Range Organics (GRO)-C6-C10	1000	1100	111	66 - 139	

Surrogate	% Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	105	70 - 130

Calculations are performed before rounding to avoid round-off errors in calculated results.

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

Matrix Spike/
Matrix Spike Duplicate Recovery Report - Batch: 400-22791

Method: 8015M
Preparation: 5035

MS Lab Sample ID:	400-9790-A-5-C MS	Analysis Batch: 400-22790	Instrument ID: GC/PID/FID
Client Matrix:	Solid	Prep Batch: 400-22791	Lab File ID: B031003.D
Dilution:	1.0		Initial Weight/Volume: 5.06 g
Date Analyzed:	03/10/2006 1141		Final Weight/Volume: 5 mL
Date Prepared:	03/09/2006 0952		Injection Volume:
			Column ID: PRIMARY

MSD Lab Sample ID:	400-9790-A-5-D MSD	Analysis Batch: 400-22790	Instrument ID: GC/PID/FID
Client Matrix:	Solid	Prep Batch: 400-22791	Lab File ID: B031004.D
Dilution:	1.0		Initial Weight/Volume: 4.99 g
Date Analyzed:	03/10/2006 1237		Final Weight/Volume: 5 mL
Date Prepared:	03/09/2006 0952		Injection Volume:
			Column ID: PRIMARY

Analyte	% Rec. MS	% Rec. MSD	Limit	RPD	RPD Limit	MS Qual	MSD Qual
Gasoline Range Organics (GRO)-C6-C10	113	120	53 - 130	7	24		

Surrogate	MS % Rec	MSD % Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	103	104	70 - 130

Calculations are performed before rounding to avoid round-off errors in calculated results.

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

Method Blank - Batch: 400-22662

Method: 8015B
Preparation: 3550B

Lab Sample ID: MB 400-22662/15-A
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2006 1522
Date Prepared: 03/09/2006 0759

Analysis Batch: 400-22742
Prep Batch: 400-22662
Units: mg/Kg

Instrument ID: GC/FID/FID
Lab File ID: 1001011.D
Initial Weight/Volume: 30.00 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Result	Qual	RL
Diesel Range Organics [C10-C28]	<2.5		2.5

Surrogate	% Rec	Acceptance Limits
o-Terphenyl	102	64 - 164

Laboratory Control Sample - Batch: 400-22662

Method: 8015B
Preparation: 3550B

Lab Sample ID: LCS 400-22662/14-A
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 03/09/2006 1527
Date Prepared: 03/09/2006 0759

Analysis Batch: 400-22742
Prep Batch: 400-22662
Units: mg/Kg

Instrument ID: GC/FID/FID
Lab File ID: 1101012.D
Initial Weight/Volume: 30.00 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Diesel Range Organics [C10-C28]	334	270	81	55 - 133	

Surrogate	% Rec	Acceptance Limits
o-Terphenyl	103	64 - 164

Calculations are performed before rounding to avoid round-off errors in calculated results.

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

Matrix Spike/
Matrix Spike Duplicate Recovery Report - Batch: 400-22662

Method: 8015B
Preparation: 3550B

MS Lab Sample ID:	400-9751-A-1-B MS	Analysis Batch: 400-22742	Instrument ID: GC/FID/FID
Client Matrix:	Solid	Prep Batch: 400-22662	Lab File ID: 1301014.D
Dilution:	1.0		Initial Weight/Volume: 30.24 g
Date Analyzed:	03/09/2006 1535		Final Weight/Volume: 5.0 mL
Date Prepared:	03/09/2006 0759		Injection Volume:
			Column ID: PRIMARY

MSD Lab Sample ID:	400-9751-A-1-C MSD	Analysis Batch: 400-22742	Instrument ID: GC/FID/FID
Client Matrix:	Solid	Prep Batch: 400-22662	Lab File ID: 1401015.D
Dilution:	1.0		Initial Weight/Volume: 30.18 g
Date Analyzed:	03/09/2006 1539		Final Weight/Volume: 5.0 mL
Date Prepared:	03/09/2006 0759		Injection Volume:
			Column ID: PRIMARY

	% Rec.						
Analyte	MS	MSD	Limit	RPD	RPD Limit	MS Qual	MSD Qual
Diesel Range Organics [C10-C28]	77	73	8 - 176	6	64		

Surrogate	MS % Rec	MSD % Rec	Acceptance Limits
o-Terphenyl	106	97	64 - 164

Calculations are performed before rounding to avoid round-off errors in calculated results.

C6C060171 400-9745 **INTER-COMPANY LOG**

COMMENTS:

Project Manager: Chris Kovitch
Project: MF-PJS-06008 Wheeling Pittsburgh Steel
Report Type: B Standard Report
Client: 7616 - Wheeling Pittsburgh Steel

RUSH

Date Received: 2006-03-06
Analytical Due Date: 2006-03-13
Report Due Date: 2006-03-14

WORK LOCATION: ***I8*** ***STL Pensacola***

SMP#: 1 CLIENT ID: MF-PJS-06008 CHEM-TREAT WASTE DATE SAMPLED: 20060303 MATRIX: A SOLID

SAMPLE COMMENTS:

METHOD: Z0 NONE NONE **SOLID, 8015 GRO (STL Pensacola)**
EXTRACTION: 88 NO SAMPLE PREPARATION PERFORMED / QC TYPE: 01 STANDARD TEST SET
WORKORDER H0PE41C4 METAL: XX

METHOD: Z0 NONE NONE **SOLID,8015 DRO STL Pensacola**
EXTRACTION: 88 NO SAMPLE PREPARATION PERFORMED / QC TYPE: 01 STANDARD TEST SET
WORKORDER H0PE41C3 METAL: XX

The sample(s) listed on this form are being sent to your location for the specified analysis. If you have any questions, please contact the Project Manager listed above. PLEASE RETURN THE ORIGINAL SIGNED FORM WITH THE REPORT AT THE COMPLETION OF ANALYSIS.

Thank You

STL- Pittsburgh
Sample Receiving

RELINQUISHED BY: Gary L Doak DATE: 3-6-06
RECEIVED FOR LAB BY: Raulen Hedania DATE: 03-07-06 0855

729991

1.32

LOGIN SAMPLE RECEIPT CHECK LIST

Client: Severn Trent Laboratories, Inc.

Job Number: 400-9745-1

Login Number: 9745

Question	T/F/NA	Comment
Radioactivity either was not measured or, if measured, is at or below background	NA	
The cooler's custody seal, if present, is intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	1.3°C
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	False	Sample time not provided on COC
Appropriate sample containers are used.	True	Volatile soil rec'd in bulk jar
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	NA	
If necessary, staff have been informed of any short hold time or quick TAT needs	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	

Att #7

PANNIER CORPORATION
207 SANDUSKY STREET, PITTSBURGH, PA 15212-5823 U.S.A.

MATERIAL SAFETY DATA SHEET

IMPORTANT: Read this MSDS before handling and disposing of this product and pass this information on to employees, customers and users of this product.

PRODUCT DESCRIPTION: #3 BLACK INK **PREPARATION DATE:** 3/03/97 - Rev. 4

SECTION I - GENERAL INFORMATION

24 HOUR EMERGENCY TELEPHONE NUMBER: (412) 323-4900

TRADE NAME: PANNIER "MASTER MARKER"
GENERIC NAME: Flexographic Ink
CHEMICAL FAMILY: Mixture
CAS NO.: NOT AVAILABLE (MIXTURE)
DOT HAZARDOUS MATERIALS PROPER SHIPPING NAME: Ink
DOT HAZARD CLASS: Flammable Liquid
UN/NA ID NO.: UN 1210
HMIS CODES: 2H, 3F, 0R

SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	CAS NUMBER	OCCUPATIONAL EXPOSURE LIMITS OSHA PEL	OCCUPATIONAL EXPOSURE LIMITS ACGIH TLV	SEE SEC.VI	VAPOR PRESSURE MM HG	VAPOR PRESSURE @ TEMP	WEIGHT PERCENT
Isopropyl and Ethyl Alcohol	67-63-0	400 PPM	400 PPM	400 PPM	37 0	68°F	30
*Methanol	67-56-1	200 PPM	200 PPM	X	96.0	68°F	1

*INDICATES TOXIC CHEMICAL(S) SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III AND OF 40 CFR 372.

SECTION III - PHYSICAL DATA

BOILING RANGE: 147 to 165°F
SPECIFIC GRAVITY ($H_2O = 1$): 1.0
VAPOR DENSITY: Heavier than Air
EVAPORATION RATE: Slower than Ether
MATERIAL V.O.C.: 2.94 LB/GL (352 G/L)
SOLUBILITY IN WATER: Soluble
APPEARANCE AND ODOR: Thin Colored Liquid, Alcoholic

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 53°F
METHOD USED: Closed Cup
FLAMMABLE LIMITS IN AIR BY VOLUME: LOWER: 2.0% UPPER: 36.5%
EXTINGUISHING MEDIA: Alcohol Foam, CO_2, Dry Chemical, Water Fog
SPECIAL FIREFIGHTING PROCEDURES: Water spray may be ineffective. Water may be used to cool closed containers to prevent explosion when exposed to extreme heat. Full protective equipment may be needed to protect firefighters from hazardous combustion products.
UNUSUAL FIRE AND EXPLOSION HAZARDS: Closed containers may explode or collapse when exposed to extreme heat. During emergency conditions, overexposure to decomposition products may cause a health hazard.

SECTION V - REACTIVITY DATA

STABILITY: Stable
CONDITIONS TO AVOID: Heat, Sparks and Open Flame
INCOMPATIBILITY (MATERIALS TO AVOID): Contact with strong acids, alkalis or oxidizers.
HAZARDOUS DECOMPOSITION OR BYPRODUCTS: May produce carbon monoxide, carbon dioxide, oxides of nitrogen, and other hazardous decomposition products.
HAZARDOUS POLYMERIZATION: Will not occur.

PANNIER CORPORATION
MATERIAL SAFETY DATA SHEET

SECTION VI - HEALTH HAZARD DATA

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE: Irritation of nose and throat, dizziness, headache, nausea and narcosis.

SKIN AND EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE: SKIN: Prolonged or repeated contact may dry and irritate skin. EYES: Moderately irritating.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE: Dermatitis may result from repeated contact.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE: Can cause nausea, vomiting and narcosis.

HEALTH HAZARDS (ACUTE AND CHRONIC): ACUTE: Moderate irritation of eyes, nose, throat and skin. High concentrations may cause nervous system disturbances and narcosis. CHRONIC: None currently known.

CARCINOGENICITY: **NTP?** No **IARC MONOGRAPHS?** No **OSHA REGULATED?** No

None Currently Known

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: Respiratory irritation, dermatitis and nausea.

EMERGENCY AND FIRST AID PROCEDURES: INHALATION: Remove to fresh air. Restore breathing. Treat symptoms. Consult a physician. EYES: Flush immediately with water for 15 minutes. See a physician. SKIN: Wash with soap and water. Remove contaminated clothing. Consult a physician if irritation persists. INGESTION: Drink water to dilute. Do NOT induce vomiting. Consult a physician or poison control center immediately.

SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Eliminate all sources of vapor ignition. Ventilate area. Avoid breathing vapors. Remove by suitable inert absorbing material.

WASTE DISPOSAL METHOD: Incineration is preferred, in compliance with local, state and federal regulations. Refer to MSDS caution information before attempting to cleanup.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Keep containers closed when not in use, and keep away from heat, sparks and open flame. Avoid excessive inhalation of vapor or mist.

OTHER PRECAUTIONS: In accordance with good industrial practice, handle with care and avoid unnecessary contact. Use only with adequate ventilation. Wash thoroughly after handling. For industrial use only. HMIS personal protective equipment is dependent upon conditions of use.

SECTION VIII - CONTROL MEASURES

RESPIRATORY PROTECTION: When used with adequate ventilation none normally required. However, when required its use must be in compliance with all OSHA health and fit testing requirements, as given in 29 CFR 1910.134.

VENTILATION: Sufficient volume and pattern should be provided to keep air contaminant concentrations below current ACGIH TLV limits.

PROTECTIVE GLOVES: Protective gloves recommended for prolonged or repeated contact. Use rubber or plastic.

EYE PROTECTION: Safety eyewear is recommended and should be available to avoid accidental contact.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT: Use protective cream when skin contact is likely.

WORK/HYGIENIC PRACTICES: Wash hands before eating, drinking or smoking. Avoid smoking in work area.

SECTION IX - SPECIAL PRECAUTIONS

NO OTHER DATA AVAILABLE

SECTION X - REGULATORY INFORMATION

SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 (SARA) TITLE III TOXIC CHEMICAL(S) SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III AND OF 40 CFR 372.

	CAS NUMBER
Methanol	67-56-1

DISCLAIMER OF LIABILITY

THE INFORMATION IN THIS MSDS WAS OBTAINED FROM SOURCES WHICH WE BELIEVE ARE RELIABLE. HOWEVER, THE INFORMATION IS PROVIDED WITHOUT ANY REPRESENTATION OR WARRANTY, EXPRESS OR IMPLIED, REGARDING ITS ACCURACY OR CORRECTNESS. THE CONDITIONS OR METHODS OF HANDLING, STORAGE, USE AND DISPOSAL OF THE PRODUCT ARE BEYOND OUR CONTROL AND MAY BE BEYOND OUR KNOWLEDGE. FOR THIS AND OTHER REASONS, WE DO NOT ASSUME RESPONSIBILITY AND EXPRESSLY DISCLAIM LIABILITY FOR LOSS, DAMAGE OR EXPENSE ARISING OUT OF OR IN ANY WAY CONNECTED WITH THE HANDLING, STORAGE, USE OR DISPOSAL OF THE PRODUCT.

Att #8

SEVERN TRENT STL

STL Pittsburgh
301 Alpha Drive
Pittsburgh, PA 15238

Tel: 412 963 7058 Fax: 412 963 2468
www.stl-inc.com

ANALYTICAL REPORT

PROJECT NO. MF-PJS-07002

Wheeling Pittsburgh Steel

Lot #: C7A150126

Pat Smith

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.

Christina M. Kovitch
Project Manager

January 23, 2007

SEVERN TRENT STL

ACCREDITED IN ACCORDANCE WITH

NELAC REPORTING:

The format and content of the attached report meets NELAC standards and guidelines except as noted in the narrative. The table below presents a summary of the certifications held by STL Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is Pennsylvania DEP. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State Program	Certificate	Program Types	STL Pittsburgh
NFESC	NA	NAVY	X
USACE	NA	Corps of Engineers	X
US Dept of Agriculture	(#S-46425)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW HW	X X
California – nelac	04224CA	WW HW	X X
Connecticut	(#PH-0688)	WW HW	X X
Florida – nelac	(#E87660)	WW HW	X X
Illinois – nelac	(#200005)	WW HW	X X
Kansas – nelac	(#E-10350)	WW HW	X X
Louisiana – nelac	(#93200)	WW HW	X X
New Hampshire – nelac	(#203002)	WW --	X --
New Jersey – nelac	(PA-005)	WW HW	X X
New York – nelac	(#11182)	WW HW	X X
North Carolina	(#434)	WW HW	X X
Ohio Vap	(#CL0063)	WW HW	X X
Pennsylvania - nelac	(#02-00416)	WW HW	X X
South Carolina	(#89014001)	WW HW	X X
Utah – nelac	(STLP)	WW HW	X X
West Virginia	(#142)	WW HW	X X
Wisconsin	998027800	WW HW	X X

The codes utilized for program types are described below:

HW	Hazardous Waste certification
WW	Non-potable Water and/or Wastewater certification
X	Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

Updated: 04/27/06

CASE NARRATIVE
Wheeling Pittsburgh Steel

LOT # C7A150126

Sample Receiving:
STL Pittsburgh received one sample on January 15, 2007. The cooler was received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

Metals:
The sample was analyzed at a dilution for arsenic, cadmium, chromium, lead and silver due to zinc saturation.

General Chemistry:
STL North Canton, Ohio performed the total cyanide analysis. All results are included in the report.

STL Pensacola, FL performed the GRO, ORO, and the DRO analyses. Their report is attached.

METHODS SUMMARY

C7A150126

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Amenable cyanide	SM18 4500-CN E	SM18 4500-CN E
Ignitability	SW846 SECTION 7	SW846 SECTION 7
Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 1311/3010
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A	SW846 1311/7470
Soil and Waste pH	SW846 9045C	SW846 9045C
Sulfides, Total 9030B/9034	SW846 9030B/903	SW846 9030B/903
Total Residue as Percent Solids	MCAWW 160.3 MOD	MCAWW 160.3 MOD

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SM18 "Standard Methods for the Examination of Water and Wastewater", 18th Edition, 1992.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C7A150126

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
JMVJ5	001	MF-PJS-07002 GALVANIZING CLEANOUT SLUDGE	01/11/07	13:30

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

C7A150126

Chain of Custody Record

STL
Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
WPSC	C. COVITCH	1/11/07	312058
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page** 1 of 1
COMMERCIAL AVENUE			
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	
MINGO JUNCTION / OH / 43938			
Project Name and Location (State)	**Carrier/Waybill Number**		
Contract/Purchase Order/Quote No.			
44924			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Solid	Containers & Preservatives: Unpres.	HNO3	H2SO4	HCl	NaOH	ZnAc/NaOH	Analysis: TCLP 8-METALS	Ta SOLIDS	pH	FLASH POINT	Amenable CN	TOTAL S	TPH (Gro, DRO)	Special Instructions/ Conditions of Receipt
MF-PJS-07002 GALVANIZING CLEANER SLUDGE	1/11/07	13:30		✓			✓	✓						✓	✓	✓	✓	✓	✓	✓	1 QUART JAR

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☑ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____

QC Requirements (Specify)

	Relinquished By	Date	Time	Received By	Date	Time
1.	* Tom Davis	1/12/07	9:45AM	Gary L Doak	1-12-07	9:45AM
2.	Gary L Doak	1-15-07	11:20	Gary L Doak	1-15-07	11:20
3.						

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH
Client ID: MF-PJS-07002 GALVANIZING CLEANOUT SLUDGE

Client Name: Wheeling Pittsburgh Steel
Lab ID: C7A150126 001

Matrix: SOLID
Date Received: 1/15/2007

Date Sampled: 1/11/2007 1:30PM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
SW846	6010B	*TCLP Leachate / Acid Digestion*					STL Pittsburgh	
Barium		ND	mg/L	0.00048	10.0	1	1/19/2007 / 1/19/2007 15:48	DB
Selenium		ND	mg/L	0.032	0.25	1	1/19/2007 / 1/19/2007 15:48	DB
Arsenic		ND	mg/L	0.22	5.0	10	1/19/2007 / 1/22/2007 12:23	DB
Lead		ND	mg/L	0.088	5.0	10	1/19/2007 / 1/22/2007 12:23	DB
Silver		ND	mg/L	0.019	5.0	10	1/19/2007 / 1/22/2007 12:23	DB
Chromium		ND	mg/L	0.018	5.0	10	1/19/2007 / 1/22/2007 12:23	DB
Cadmium		ND	mg/L	0.017	1.0	10	1/19/2007 / 1/22/2007 12:23	DB
SW846	7470A	*TCLP Leachate / Mercury Preparation*					STL Pittsburgh	
Mercury		ND	mg/L	0.000048	0.00020	1	1/19/2007 / 1/19/2007 18:22	JS
SM18	4500-CN E	*Distillation procedure*					STL North Canton	
Amenable cyanide		ND	mg/kg	0.19	1.6	1	1/17/2007 / 1/17/2007 00:00	CT
SW846	SECTION 7.1.	*Ignitability*					STL Pittsburgh	
Ignitability		ND NO	No Units	--	--	1	1/20/2007 / 1/20/2007 00:00	DB
SW846	9045C	*pH - Non-Aqueous*					STL Pittsburgh	
pH		6.3	No Units			1	1/16/2007 / 1/16/2007 19:04	WB
SW846	9030B/9034	*Sulfides, Total*					STL Pittsburgh	
Total Sulfide		ND	mg/kg	40.2	98.3	1	1/16/2007 / 1/17/2007 00:00	DB
MCAWW	160.3 MOD	*Total Residue as Percent Solids*					STL Pittsburgh	
Percent Solids		30.5	%	0.0	1.0	1	1/15/2007 / 1/16/2007 05:45	CLL

STL PITTSBURGH *Results per sample*

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name: STL PITTSBURGH **Client ID:** INTRA-LAB QC

Client Name: Wheeling Pittsburgh Steel **Lab ID:** C7A150126 001

Matrix: SOLID

Analyses	DUP	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	SECTION 7.1.	*Ignitability*			STL Pittsburgh					
Ignitability		ND	No Units	--	1	1/20/2007	DB	NO		0/0.0
SW846	9045C	*pH - Non-Aqueous*			STL Pittsburgh					
pH		6.7	No Units		1	1/16/2007	WB			1.3/2.0
MCAWW	160.3 MOD	*Total Residue as Percent Solids*			STL Pittsburgh					
Percent Solids		56.2	%	1.0	1	1/16/2007	CLL			1.6/20

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*TCLP Leachate / Acid Digestion*		STL Pittsburgh					
Arsenic				1	1/19/2007	DB	117	(80 - 120)	
Lead				1	1/19/2007	DB	105	(80 - 120)	
Barium				1	1/19/2007	DB	110	(80 - 120)	
Selenium				1	1/19/2007	DB	115	(80 - 120)	
Silver				1	1/19/2007	DB	109	(80 - 120)	
Chromium				1	1/19/2007	DB	108	(80 - 120)	
Cadmium				1	1/19/2007	DB	106	(80 - 120)	
SW846	7470A	*TCLP Leachate / Mercury Preparation*		STL Pittsburgh					
Mercury				1	1/19/2007	JS	103	(80 - 120)	

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SM18	4500-CN E	*Distillation procedure*		STL North Canton					
Amenable cyanide				1	1/17/2007	CT	108	(65 - 120)	
SW846	9045C	*pH - Non-Aqueous*		STL Pittsburgh					
pH				1	1/16/2007	WB	100	(99 - 101)	
SW846	9030B/9034	*Sulfides, Total*		STL Pittsburgh					
Total Sulfide				1	1/17/2007	DB	100	(75 - 125)	

Wheeling Pittsburgh Steel

Lab Name:	STL PITTSBURGH	**Client ID:**	BLK - C7A170000295B
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C7A150126
Matrix:	SOLID		

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	6010B	*TCLP Leachate / Acid Digestion*			STL Pittsburgh					
Arsenic		ND	mg/L	0.50	1	1/19/2007	DB			
Lead		ND	mg/L	0.50	1	1/19/2007	DB			
Barium		ND	mg/L	10.0	1	1/19/2007	DB			
Selenium		ND	mg/L	0.25	1	1/19/2007	DB			
Silver		ND	mg/L	0.50	1	1/19/2007	DB			
Chromium		ND	mg/L	0.50	1	1/19/2007	DB			
Cadmium		ND	mg/L	0.10	1	1/19/2007	DB			
Arsenic		ND	mg/L	0.50	1	1/19/2007	DB			
Lead		ND	mg/L	0.50	1	1/19/2007	DB			
Barium		ND	mg/L	10.0	1	1/19/2007	DB			
Selenium		ND	mg/L	0.25	1	1/19/2007	DB			
Silver		ND	mg/L	0.50	1	1/19/2007	DB			
Chromium		ND	mg/L	0.50	1	1/19/2007	DB			
Cadmium		ND	mg/L	0.10	1	1/19/2007	DB			
SW846	7470A	*TCLP Leachate / Mercury Preparation*			STL Pittsburgh					
Mercury		ND	mg/L	0.00020	1	1/19/2007	JS			
Mercury		ND	mg/L	0.00020	1	1/19/2007	JS			

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SM18	4500-CN E	*Distillation procedure*			STL North Canton					
Amenable cyanide		ND	mg/kg	0.50	1	1/17/2007	CT			
SW846	9030B/9034	*Sulfides, Total*			STL Pittsburgh					
Total Sulfide		ND	mg/kg	30.0	1	1/17/2007	DB			

MS/MSD Report

Analyses	Analysis Date	MS % Recovery	MSD % Recovery	QC Limits	RPD/ Limit
Laboratory QC ID: C7A150179001S TCLP Leachate / Acid Digestion					
Arsenic	1/19/2007	99	101	(75 - 125)	1.8/20
Barium	1/19/2007	101	102	(75 - 125)	1.1/20
Cadmium	1/19/2007	96	99	(75 - 125)	3.0/20
Chromium	1/19/2007	89	91	(75 - 125)	2.4/20
Lead	1/19/2007	87	90	(75 - 125)	3.3/20
Selenium	1/19/2007	105	107	(75 - 125)	1.5/20
Silver	1/19/2007	89	84	(75 - 125)	5.0/20
Laboratory QC ID: C7A150126001S TCLP Leachate / Mercury Preparation					
Mercury	1/19/2007	77	77	(75 - 125)	0.25/20
Laboratory QC ID: C7A110317001S Sulfides, Total					
Total Sulfide	1/17/2007	110	105	(75 - 125)	3.1/20

SEVERN TRENT STL

ANALYTICAL REPORT

Job Number: 400-18326-1

Job Description: C7A150126

For:
Severn Trent Laboratories, Inc.
301 Alpha Drive
RIDC Park
Pittsburgh, PA 15238

Attention: Ms. Chris Kovitch

Cheyenne Whitmire

Cheyenne Whitmire
Project Manager I
cwhitmire@stl-inc.com
01/25/2007

Project Manager: Cheyenne Whitmire

The test results in this report meet all NELAP requirements for accredited parameters and relate only to the referenced samples. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced except in full, and with written approval from the laboratory. STL Pensacola Certifications and Approvals: Alabama (#40150), Arizona (#AZ0589), Arkansas (#88-0689), California (#2510), Florida (#E81010), Florida CQAP (#980156), Illinois (#200041), Iowa (#367), Kansas (#E10253), Kentucky UST (#0053), Louisiana (#30748), Maryland (#233), Massachusetts (#M-FL094), Michigan (#9912), New Hampshire (#250502), New Jersey (#FL006), North Carolina (#314), North Dakota (#R-108), Oklahoma (#9810), Pennsylvania (#68-467), South Carolina (#96026), Tennessee (#02907), Virginia (#00008), West Virginia (#136), USDA Foreign Soil Permit (#S-37599).

Severn Trent Laboratories, Inc.
STL Pensacola 3355 McLemore Drive, Pensacola, FL 32514
Tel (850) 474-1001 Fax (850) 478-2671 www.stl-inc.com

ACCREDITED IN ACCORDANCE WITH nelac

METHOD SUMMARY

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

Description	Lab Location	Method	Preparation Method
Matrix: Solid			
Aromatic and Halogenated VOCs by Gas Chromatography using PID or ECD	STL PEN	SW846 8021B	
Closed System Purge & Trap/Field Preservation	STL PEN		SW846 5035
Nonhalogenated Organics using GC/FID -Modified (Diesel Range Organics)	STL PEN	SW846 8015B	
Ultrasonic Extraction	STL PEN		SW846 3550B
Percent Moisture	STL PEN	EPA PercentMoisture	

LAB REFERENCES:

STL PEN = STL Pensacola

METHOD REFERENCES:

EPA - US Environmental Protection Agency

SW846 - "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

METHOD / ANALYST SUMMARY

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

Method	Analyst	Analyst ID
SW846 8021B	Khramova, Galina	GK
SW846 8015B	Enfinger, Isabel	IE
EPA PercentMoisture	Nelson, Darlene	DN

SAMPLE SUMMARY

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

Lab Sample ID	Client Sample ID	Client Matrix	Date/Time Sampled	Date/Time Received
400-18326-1	MF-PJS-07002 GALVANIZING CLEANO	Solid	01/11/2007 0000	01/17/2007 0855

SAMPLE RESULTS

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

Client Sample ID: MF-PJS-07002 GALVANIZING CLEANO

Lab Sample ID: 400-18326-1
Client Matrix: Solid
% Moisture: 64.8
Date Sampled: 01/11/2007 0000
Date Received: 01/17/2007 0855

8021B Aromatic and Halogenated VOCs by Gas Chromatography using PID or ECD

Method: 8021B
Preparation: 5035
Dilution: 1.0
Date Analyzed: 01/23/2007 1211
Date Prepared: 01/23/2007 0900
Analysis Batch: 400-42119
Prep Batch: 400-42116
Instrument ID: GC/PID/FID
Lab File ID: R012206.D
Initial Weight/Volume: 4.40 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	DryWt Corrected: Y	Result (ug/Kg)	Qualifier	RL
Gasoline Range Organics (GRO)-C6-C10		1000		320

Surrogate	%Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	128	60 - 134

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

Client Sample ID: **MF-PJS-07002 GALVANIZING CLEANO**

Lab Sample ID: 400-18326-1 Date Sampled: 01/11/2007 0000
Client Matrix: Solid % Moisture: 64.8 Date Received: 01/17/2007 0855

8015B Nonhalogenated Organics using GC/FID -Modified (Diesel Range Organics)

Method: 8015B Analysis Batch: 400-42098 Instrument ID: GC/FID/FID
Preparation: 3550B Prep Batch: 400-41864 Lab File ID: A005005.D
Dilution: 2.0 Initial Weight/Volume: 30.11 g
Date Analyzed: 01/24/2007 1423 Final Weight/Volume: 5.0 mL
Date Prepared: 01/19/2007 0822 Injection Volume:
Column ID: PRIMARY

Analyte	DryWt Corrected: Y	Result (mg/Kg)	Qualifier	RL
Diesel Range Organics [C10-C28]		3800		14
Oil Range Organics (C28-C35)		940		14

Surrogate	%Rec	Acceptance Limits
o-Terphenyl	85	68 - 141

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

General Chemistry

Client Sample ID: **MF-PJS-07002 GALVANIZING CLEANO**

Lab Sample ID: 400-18326-1
Client Matrix: Solid

Date Sampled: 01/11/2007 0000
Date Received: 01/17/2007 0855

Analyte	Result	Qual	Units	RL	Dil	Method
Percent Solids	35		Percent	0.10	1.0	PercentMoisture
	Anly Batch: 400-41793		Date Analyzed 01/17/2007 0000			

QUALITY CONTROL RESULTS

Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

QC Association Summary

Lab Sample ID	Client Sample ID	Report Basis	Client Matrix	Method	Prep Batch
GC VOA					
Prep Batch: 400-42116					
LCS 400-42116/2-AA	Lab Control Spike	T	Solid	5035	
MB 400-42116/1-AA	Method Blank	T	Solid	5035	
400-18326-1	MF-PJS-07002 GALVANIZING	T	Solid	5035	
400-18365-A-6-E MS	Matrix Spike	T	Solid	5035	
400-18365-A-6-F MSD	Matrix Spike Duplicate	T	Solid	5035	
Analysis Batch:400-42119					
LCS 400-42116/2-AA	Lab Control Spike	T	Solid	8021B	400-42116
MB 400-42116/1-AA	Method Blank	T	Solid	8021B	400-42116
400-18326-1	MF-PJS-07002 GALVANIZING	T	Solid	8021B	400-42116
400-18365-A-6-E MS	Matrix Spike	T	Solid	8021B	400-42116
400-18365-A-6-F MSD	Matrix Spike Duplicate	T	Solid	8021B	400-42116

Report Basis
T = Total

GC Semi VOA

Prep Batch: 400-41864					
LCS 400-41864/4-AA	Lab Control Spike	T	Solid	3550B	
MB 400-41864/5-AA	Method Blank	T	Solid	3550B	
400-18326-1	MF-PJS-07002 GALVANIZING	T	Solid	3550B	
Analysis Batch:400-42098					
LCS 400-41864/4-AA	Lab Control Spike	T	Solid	8015B	400-41864
MB 400-41864/5-AA	Method Blank	T	Solid	8015B	400-41864
400-18326-1	MF-PJS-07002 GALVANIZING	T	Solid	8015B	400-41864

Report Basis
T = Total

General Chemistry

Analysis Batch:400-41793					
400-18326-1	MF-PJS-07002 GALVANIZING	T	Solid	PercentMoisture	

Report Basis
T = Total

Client: Severn Trent Laboratories, Inc.

Job Number: 400-18326-1

Method Blank - Batch: 400-42116

Method: 8021B
Preparation: 5035

Lab Sample ID: MB 400-42116/1-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 01/23/2007 1013
Date Prepared: 01/23/2007 0900

Analysis Batch: 400-42119
Prep Batch: 400-42116
Units: ug/Kg

Instrument ID: GC/PID/FID
Lab File ID: R012203.D
Initial Weight/Volume: 5.0 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Result	Qual	RL
Gasoline Range Organics (GRO)-C6-C10	<100		100

Surrogate	% Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	115	60 - 134

Lab Control Spike - Batch: 400-42116

Method: 8021B
Preparation: 5035

Lab Sample ID: LCS 400-42116/2-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 01/23/2007 0930
Date Prepared: 01/23/2007 0900

Analysis Batch: 400-42119
Prep Batch: 400-42116
Units: ug/Kg

Instrument ID: GC/PID/FID
Lab File ID: R012202.D
Initial Weight/Volume: 5.0 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Gasoline Range Organics (GRO)-C6-C10	1000	1120	112	75 - 124	

Surrogate	% Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	110	60 - 134

Calculations are performed before rounding to avoid round-off errors in calculated results.

Client: Severn Trent Laboratories, Inc.

Job Number: 400-18326-1

Matrix Spike/
Matrix Spike Duplicate Recovery Report - Batch: 400-42116

Method: 8021B
Preparation: 5035

MS Lab Sample ID:	400-18365-A-6-E MS	Analysis Batch: 400-42119	Instrument ID: GC/PID/FID
Client Matrix:	Solid	Prep Batch: 400-42116	Lab File ID: R012214.D
Dilution:	1.0		Initial Weight/Volume: 5.09 g
Date Analyzed:	01/23/2007 1634		Final Weight/Volume: 5.0 mL
Date Prepared:	01/23/2007 0900		Injection Volume:
			Column ID: PRIMARY

MSD Lab Sample ID:	400-18365-A-6-F MSD	Analysis Batch: 400-42119	Instrument ID: GC/PID/FID
Client Matrix:	Solid	Prep Batch: 400-42116	Lab File ID: R012215.D
Dilution:	1.0		Initial Weight/Volume: 5.08 g
Date Analyzed:	01/23/2007 1701		Final Weight/Volume: 5.0 mL
Date Prepared:	01/23/2007 0900		Injection Volume:
			Column ID: PRIMARY

Analyte	% Rec. MS	% Rec. MSD	Limit	RPD	RPD Limit	MS Qual	MSD Qual
Gasoline Range Organics (GRO)-C6-C10	95	109	35 - 167	13	21		

Surrogate	MS % Rec	MSD % Rec	Acceptance Limits
a,a,a-Trifluorotoluene (fid)	118	119	60 - 134

Calculations are performed before rounding to avoid round-off errors in calculated results.

Client: Severn Trent Laboratories, Inc.

Job Number: 400-18326-1

Method Blank - Batch: 400-41864

Method: 8015B
Preparation: 3550B

Lab Sample ID: MB 400-41864/5-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 01/24/2007 1403
Date Prepared: 01/19/2007 0822

Analysis Batch: 400-42098
Prep Batch: 400-41864
Units: mg/Kg

Instrument ID: GC/FID/FID
Lab File ID: A003003.D
Initial Weight/Volume: 30.00 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Result	Qual	RL
Diesel Range Organics [C10-C28]	<2.5		2.5
Oil Range Organics (C28-C35)	<2.5		2.5

Surrogate	% Rec	Acceptance Limits
o-Terphenyl	107	68 - 141

Lab Control Spike - Batch: 400-41864

Method: 8015B
Preparation: 3550B

Lab Sample ID: LCS 400-41864/4-AA
Client Matrix: Solid
Dilution: 1.0
Date Analyzed: 01/24/2007 1413
Date Prepared: 01/19/2007 0822

Analysis Batch: 400-42098
Prep Batch: 400-41864
Units: mg/Kg

Instrument ID: GC/FID/FID
Lab File ID: A004004.D
Initial Weight/Volume: 30.00 g
Final Weight/Volume: 5.0 mL
Injection Volume:
Column ID: PRIMARY

Analyte	Spike Amount	Result	% Rec.	Limit	Qual
Diesel Range Organics [C10-C28]	346	408	118	56 - 152	

Surrogate	% Rec	Acceptance Limits
o-Terphenyl	100	68 - 141

Calculations are performed before rounding to avoid round-off errors in calculated results.

C7A150126 400-18324

INTER-COMPANY LOG

COMMENTS:

Project Manager: Chris Kovitch
Project: MF-PJS-07002 Wheeling Pittsburgh Steel
Report Type: B Standard Report
Client: 7616 - Wheeling Pittsburgh Steel

RUSH

Date Received: 2007-01-15
Analytical Due Date: 2007-01-22
Report Due Date: 2007-01-23

WORK LOCATION: ***I8*** ***STL Pensacola***

SMP#: 1 CLIENT ID: MF-PJS-07002 GALVANIZING CLEANO DATE SAMPLED: 20070111 MATRIX: A SOLID
SAMPLE COMMENTS:

METHOD: Z0 NONE NONE **SOLID, 8015 GRO (STL Pensacola)**
EXTRACTION: 88 NO SAMPLE PREPARATION PERFORMED / QC TYPE: 01 STANDARD TEST SET
WORKORDER JMVJ51AR METAL: XX

METHOD: Z0 NONE NONE **SOLID, STL Pensacola ORO (C10-C35)**
EXTRACTION: 88 NO SAMPLE PREPARATION PERFORMED / QC TYPE: 01 STANDARD TEST SET
WORKORDER JMVJ51AP METAL: XX

METHOD: Z0 NONE NONE **SOLID,8015 DRO STL Pensacola**
EXTRACTION: 88 NO SAMPLE PREPARATION PERFORMED / QC TYPE: 01 STANDARD TEST SET
WORKORDER JMVJ51AQ METAL: XX

The sample(s) listed on this form are being sent to your location for the specified analysis. If you have any questions, please contact the Project Manager listed above. PLEASE RETURN THE ORIGINAL SIGNED FORM WITH THE REPORT AT THE COMPLETION OF ANALYSIS.

Thank You

STL- Pittsburgh
Sample Receiving

RELINQUISHED BY: Gary L Doak DATE: 1-15-07

RECEIVED FOR LAB BY: Christina Stearns DATE: 1/17/07 0855

4.0°C

Seal #883642

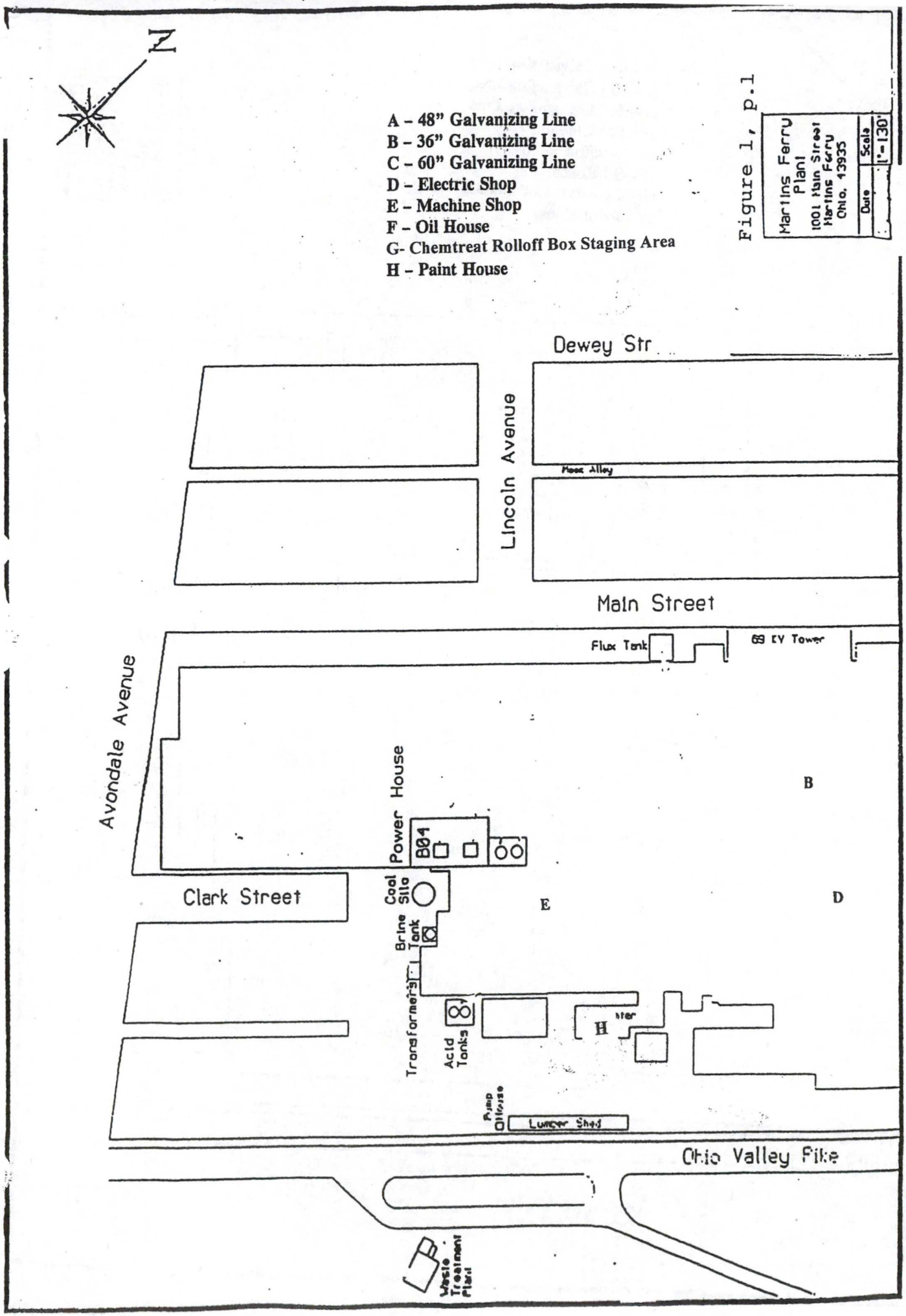
LOGIN SAMPLE RECEIPT CHECK LIST

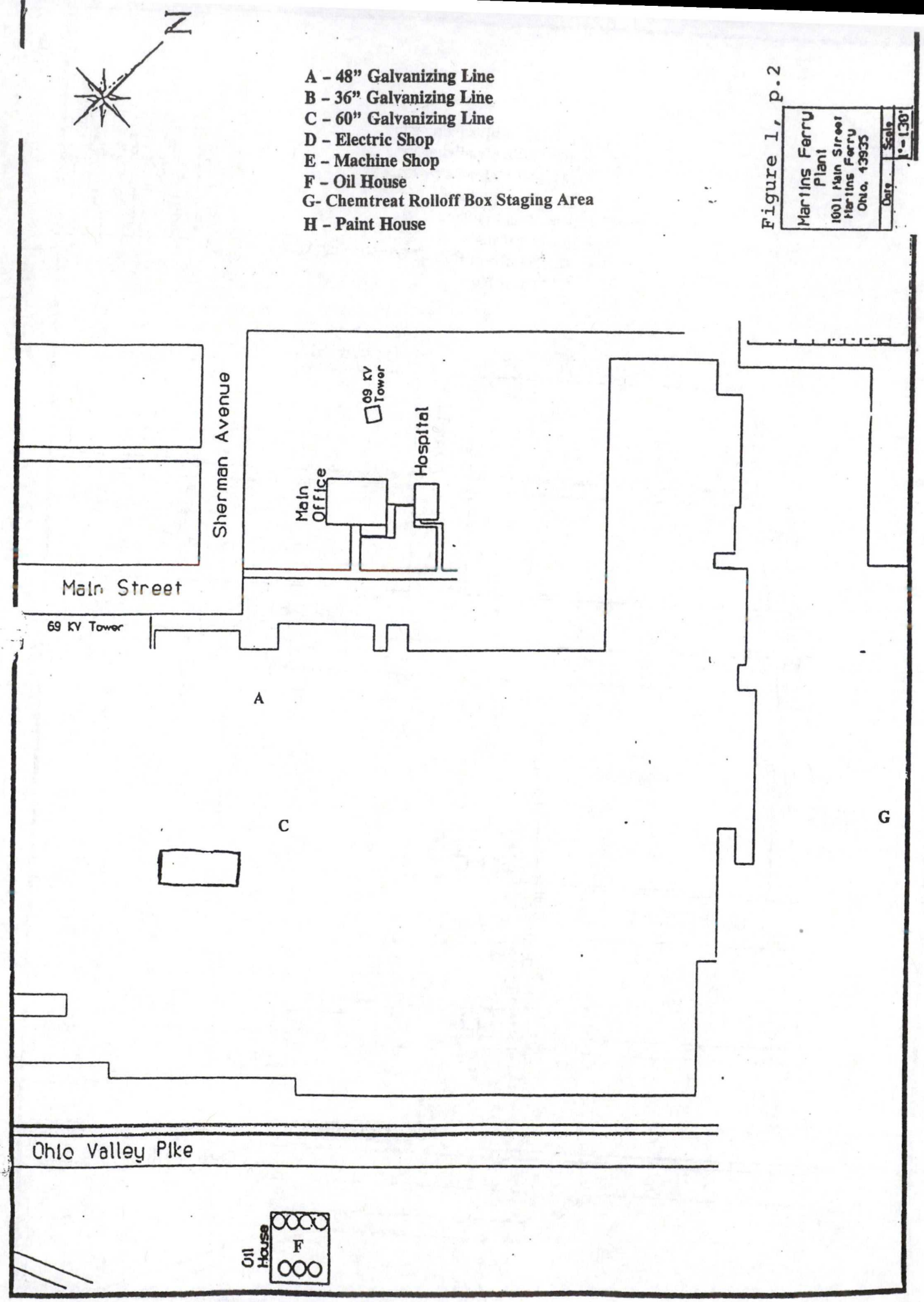
Client: Severn Trent Laboratories, Inc. Job Number: 400-18326-1

Login Number: 18326

Question	T/F/NA	Comment
Radioactivity either was not measured or, if measured, is at or below background	NA	
The cooler's custody seal, if present, is intact.	True	883642
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	4.0°C
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
There are no discrepancies between the sample IDs on the containers and the COC.	True	
Samples are received within Holding Time.	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	False	Sample time not listed on COC
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
VOA sample vials do not have headspace or bubble is <6mm (1/4") in diameter.	NA	
If necessary, staff have been informed of any short hold time or quick TAT needs	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	

Att #9


N
A – 48" Galvanizing Line
B – 36" Galvanizing Line
C – 60" Galvanizing Line
D – Electric Shop
E – Machine Shop
F – Oil House
G- Chemtreat Rolloff Box Staging Area
H – Paint House
Figure 1, p.1
Martins Ferry Plant
1001 Main Street
Martins Ferry
Ohio, 43935
Date
Scale
1" = 130'
Dewey Str
Lincoln Avenue
Main Street
Avondale Avenue
Flux Tank
Power House
B04
Coal Silo
Brine Tank
Transformers
Acid Tanks
Pump Oilhouse
Lumber Shed
Clark Street
Ohio Valley Pike
Waste Treatment Plant
B
D
E
H


N
A – 48" Galvanizing Line
B – 36" Galvanizing Line
C – 60" Galvanizing Line
D – Electric Shop
E – Machine Shop
F – Oil House
G- Chemtreat Rolloff Box Staging Area
H – Paint House
Figure 1, p.2
Martins Ferry Plant
1601 Main Street
Martins Ferry
Ohio 43935
Date
Scale
1"=130'
Sherman Avenue
69 KV Tower
Hospital
Main Office
Main Street
69 KV Tower
A
C
G
Ohio Valley Pike
Oil House
F

ATT #10

Subject: Re: WPS-MF Compliance Schedules
Date: Tue, 21 Dec 2004 12:00:15 -0500
From: "Thomas J. Waligura" <waliguratj@wpsc.com>
To: Abbot Stevenson <abbot.stevenson@epa.state.oh.us>
CC: "Bud E. Smith" <smithbe@wpsc.com>
BCC: "Thomas J. Waligura" <waliguratj@wpsc.com>

Abbot:

Our Engineering Dept. is reviewing old drawings and attempting to determine the best location for a permanent monitoring manhole on the Outfall 002 sewer and are progressing with that beginning phase of installing the new manhole. They are also evaluating ways of measuring rainfall event flow duration. Outfall 002 at the river still cannot be sampled directly because of all the mud accumulation from Hurricane Ivan. After a rain last week, Bill Polomik and I attempted to sample outfall 005 and manholes 2A1 and 2B1 on the 002 sewer. Unfortunately no flow made it to the outfall. It is supposed to rain here tomorrow and we have made plans to attempt again to get samples. If the weather cooperates we should be able to supply you with data for the outfall 002 sewer and outfall 005.

The Outfall 001 sampler and flow measuring device were actually in place during the Hurricane Ivan flooding in September. I met with the Pace field person on October 27th to make sure everything was in place and operational for sampling prior to the Nov. 1st compliance date. We ran the sampler overnight on flow proportional mode to make sure it worked properly. Everything was fine. Hurricane Ivan left a lot of mud in the sewer and around the sampling probe which may have been reflected in some of the November data. The treatment system seems to have settled down and sampling data is getting back to normal.

Although the automatic operations shutdown system has not been needed it too was in place prior to November 1st. The system to automatically notify personnel by e-mail, pager, or text messaging of alarm conditions is also in place and working.

I will be starting vacation this Thursday and will not be back in the office until January 3rd. I hope you and your Family have a Happy Holidays.

Tom Waligura

Abbot Stevenson wrote:

> *Tom,*
> *I am in the process of determining WPS-MF's status of compliance with*
> *the NPDES permit and COPI schedules. I have a few questions.*
> >
> *As a follow-up to Bud Smith's 10/28/04 letter regarding stormwater*
> *sampling at the Martins Ferry plant, do you have sampling data for*
> *outfall 002 yet? I cannot indicate compliance with the COPI paragraph 9*
> *until I receive the data (I see the data for outfall 005 was submitted*
> *on the Sept. 2004 MOR.)*
> >
> *I can't find where you notified us when the controls were installed to*
> *automatically shut down discharge of process water during weir*
> *discharges or when the flow meter installation was complete. Let me*
> *know the dates of those correspondences or if they were not sent, send*
> *notification of when these items were completed.*
> >
> *Sincerely,*
> >
> *Abbot Stevenson*

4.1.6.2

Wheeling Pittsburgh
STEEL CORPORATION
a metal products company

BUD E. SMITH
DIRECTOR
ENVIRONMENTAL CONTROL
(304) 234-2662

October 28, 2004

Ms. Abbot Stevenson
Ohio EPA
Southeast District Office
2195 Front Street
Logan, OH 43138

Re: **Wheeling-Pittsburgh Steel Corp.**
Martins Ferry Plant
Consent Decree (03CV340) & NPDES Permit
Outfall 002 Monitoring

Dear Ms. Stevenson:

According to the Consent Decree, which we entered with OEPA in August 2003, Wheeling-Pittsburgh Steel Corporation (WPSC) was to sample stormwater outfalls 002, 003, 004 and 005 for metals after the sewers were cleaned. The results of the post-sewer cleaning sample collected from Outfall 005 were submitted with the September Discharge Monitoring Report (DMR). That sample yielded a Zinc concentration of 890 ug/l, which indicates an improvement over past grab sample results of 1,000 ug/l in 1996, 2,400 ug/l in 1998 and 3,500 ug/l in 1999. No samples were taken from Outfalls 003 and 004 as they have been permanently sealed and no longer have discharges.

With regard to Outfall 002 sampling we have encountered unforeseen monitoring conditions. The invert elevation at the discharge of this sewer is at 623.76 feet above mean sea level (ft/MSL),which is about nine feet lower than the Outfall 001 sewer invert elevation of 632.753 ft/MSL. When we negotiated the Consent Decree and also the recently reissued NPDES Permit, we did not realize this difference and correspondingly that the Outfall 002 sewer was so greatly impacted by fluctuations in the Ohio River level. This significant difference in elevation was made evident by the flooding caused by the back to back hurricanes we recently endured.

Both the high waters caused by Hurricane Francis and Hurricane Ivan inundated the proposed Outfall 002 sample point with mud. It appears the sewer outlet is frequently affected after heavy rain by fluctuating river levels and subsequent sediment deposition. It does not appear feasible or practical to obtain a representative sample of storm water from this outlet point. The installation of any type of "flow duration monitor" at this outlet is also impractical.

We are presently evaluating the feasibility of installing a new manhole at a point upstream in the sewer that could be used for sampling and monitoring of flow duration. After we complete an engineering study and cost estimate for this project, we will apprise you of our findings and associated action plan and schedule.

As an interim step we propose to sample for metals upstream in the two manholes that we had designated as 2A1 and 2B1. We believe this would be sufficient to show the results of the sewer cleaning in the major portions of the Outfall 002 sewer system. A combined metals and oil & grease sample from these two manholes would also be used in the interim for DMR reporting purposes. Until the proposed new manhole project is evaluated, only an estimate of "storm duration" rather than "flow duration" can be provided for the DMR.

If you should have any questions, please contact Tom Waligura at 304 234-2682.

Very truly yours,

Bud E. Smith

Bud E. Smith

cc: Eric Nygaard (OEPA, Columbus Office)
Al Schell
Wayne Pysh
P.J. Smith/SSECMF 4.1.6.2
TJW/ECMF 4.1.6.2

BES/ECMF 4.1.6.2

BUD E. SMITH
Director, Environmental Control
(304) 234-2662

Wheeling Pittsburgh
STEEL CORPORATION

December 28, 2003

Ms. Abbot Stevenson
Ohio Environmental Protection Agency
Southeast District Office
2195 Front Street
Logan, Ohio 43138

Re: Martins Ferry Plant - Outfalls 002, 003, 004, & 005
Sewer Manhole Sediment Sampling Results – OEPA COPI

Dear Ms. Stevenson:

In accordance with Section III, A 7 of Consent Order for Preliminary Injunction (COPI) 03CV340, please find enclosed the data from the October 14th and October 31st 2003 sampling of sediment in the accessible manholes of sewers leading to Outfalls 002, 003, 004 and 005 at our Martins Ferry Plant. The sediment samples were analyzed by Severn Trent Laboratories. Analytical method SW-846 6010B was used and employed an Inductively Coupled Plasma Arc. The metals of interest were zinc, lead, iron, copper, chromium and arsenic.

An initial survey of potentially accessible manholes was made. A numbering system was developed to differentiate manhole locations for each sewer system. Drawing No. 3-4389, which shows sewer locations, is enclosed for your use. Highlighted in pink on the drawing are the manholes that were sampled in each sewer section. No manholes on the sewer section going to Outfall 004 were accessible. It appears that the sewers that previously led to Outfall 004 were routed to the Outfall 005 sewer system some time in the past.

A spreadsheet is provided showing the "Manhole Sediment Sampling Results". We have plotted the sediment concentrations for each metal and manhole location on each sewer section to try to give an indication of where the largest contribution might be originating.

We propose to clean the following sections of sewer (highlighted in yellow on Drawing No. 3-4389): from manholes 2A11 to 2A1, from manholes 2A7-3 to 2A7-2, from manholes 2B11 to 2B1, from manholes 3A4 to 3A1, and from manholes 5A3 to 5A1. Any wastewater generated from these cleaning operations will be directed to the plant's wastewater treatment system for processing. The cleaning of the sewers will begin after the Spring rains have ended. We expect to be able to begin in early June of 2004. The sewer cleaning will be completed by August 1, 2004.

If you should have any questions, please contact Mr. Thomas Waligura at (304) 234-2682.

Sincerely,

Bud E. Smith

Bud. E. Smith

Enclosures

Steel the recycled material

Bcc: BES/ECMF 4.1.6.2 (w/encl.)
O.D. Wamsley (w/encl.)
W.V. Polomik (w/encl.)
W. Pysh (w/encl.)

WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
OUTFALLS 002, 003, 004, & 005
MANHOLE SEDIMENT SAMPLING RESULTS
OCTOBER - NOVEMBER 2003

SEWER SECTION	MANHOLE #	(MG/KG) ZINC	(MG/KG) LEAD	(MG/KG) IRON	(MG/KG) COPPER	(MG/KG) CHROMIUM	(MG/KG) ARSENIC
OUTFALL 002 - SECTION 2A	2A11	299	121.0	23,300	42.4	28.7	12.3
	2A8	3080	53.5	269,000	381.0	89.9	23.0
	2A7-2	8070	129.0	48,700	87.0	64.9	63.0
	2A2	6010	180.0	42,900	203.0	51.3	10.4
	OUTFALL 002	1870	76.2	39,100	58.5	35.7	11.3

NOTE: MANHOLE 2A1 HAD NO SEDIMENT. MANHOLE 2A2 & 2A8 HAD VERY LITTLE SEDIMENT.
MANHOLES 2A-3, 2A-4, 2A-5, 2A-6, & 2A-7 NOT ACCESSIBLE.

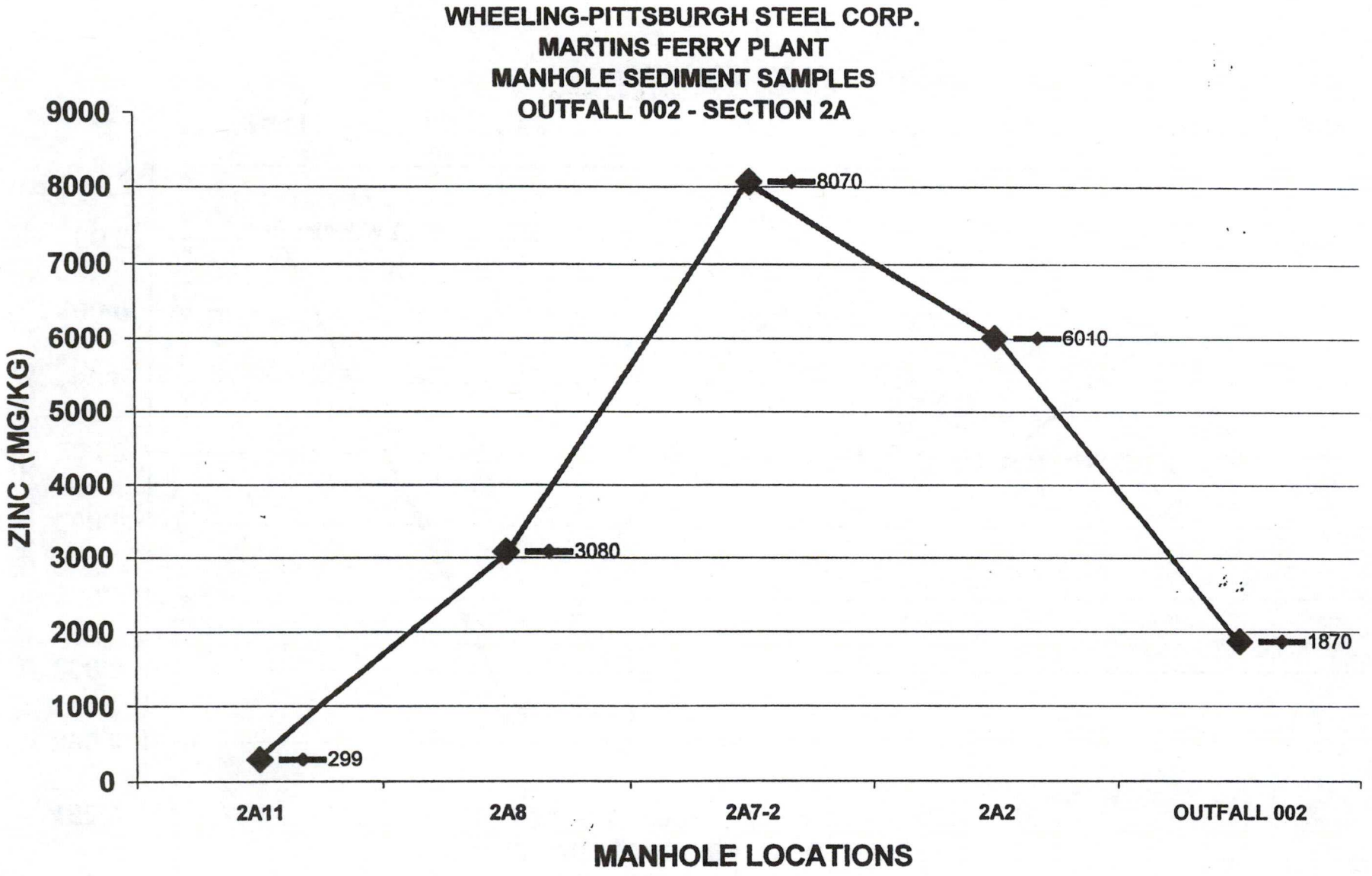
SEWER SECTION	MANHOLE #	(MG/KG) ZINC	(MG/KG) LEAD	(MG/KG) IRON	(MG/KG) COPPER	(MG/KG) CHROMIUM	(MG/KG) ARSENIC
OUTFALL 002 - SECTION 2B	2B10	5120	126	31800	72.1	43.7	10.6
	2B5	297	12.2	26700	13.2	20.3	4.1
	2B4	5860	531.0	327,000	223.0	124.0	43.0
	2B1	668	22.7	18,000	23.5	12.7	5.5
	OUTFALL 002	1870	76.2	39,100	58.5	35.7	11.3

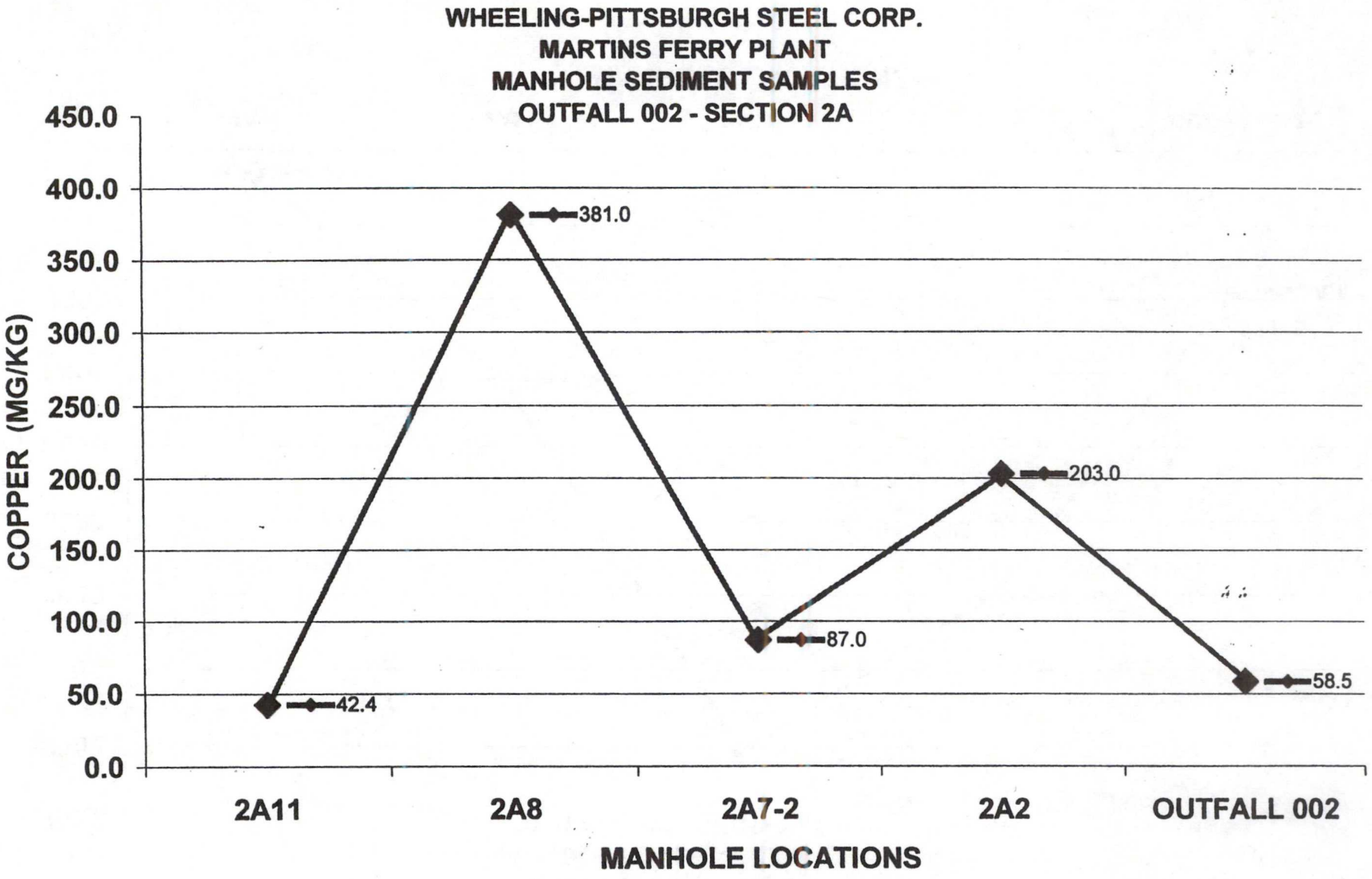
SEWER SECTION	MANHOLE #	(MG/KG) ZINC	(MG/KG) LEAD	(MG/KG) IRON	(MG/KG) COPPER	(MG/KG) CHROMIUM	(MG/KG) ARSENIC
OUTFALL 003 - SECTION 3A	3A3	8420	421.0	41,900	88.9	61.4	18.5
	3A2	5240	659.0	92,800	105.0	101.0	23.5

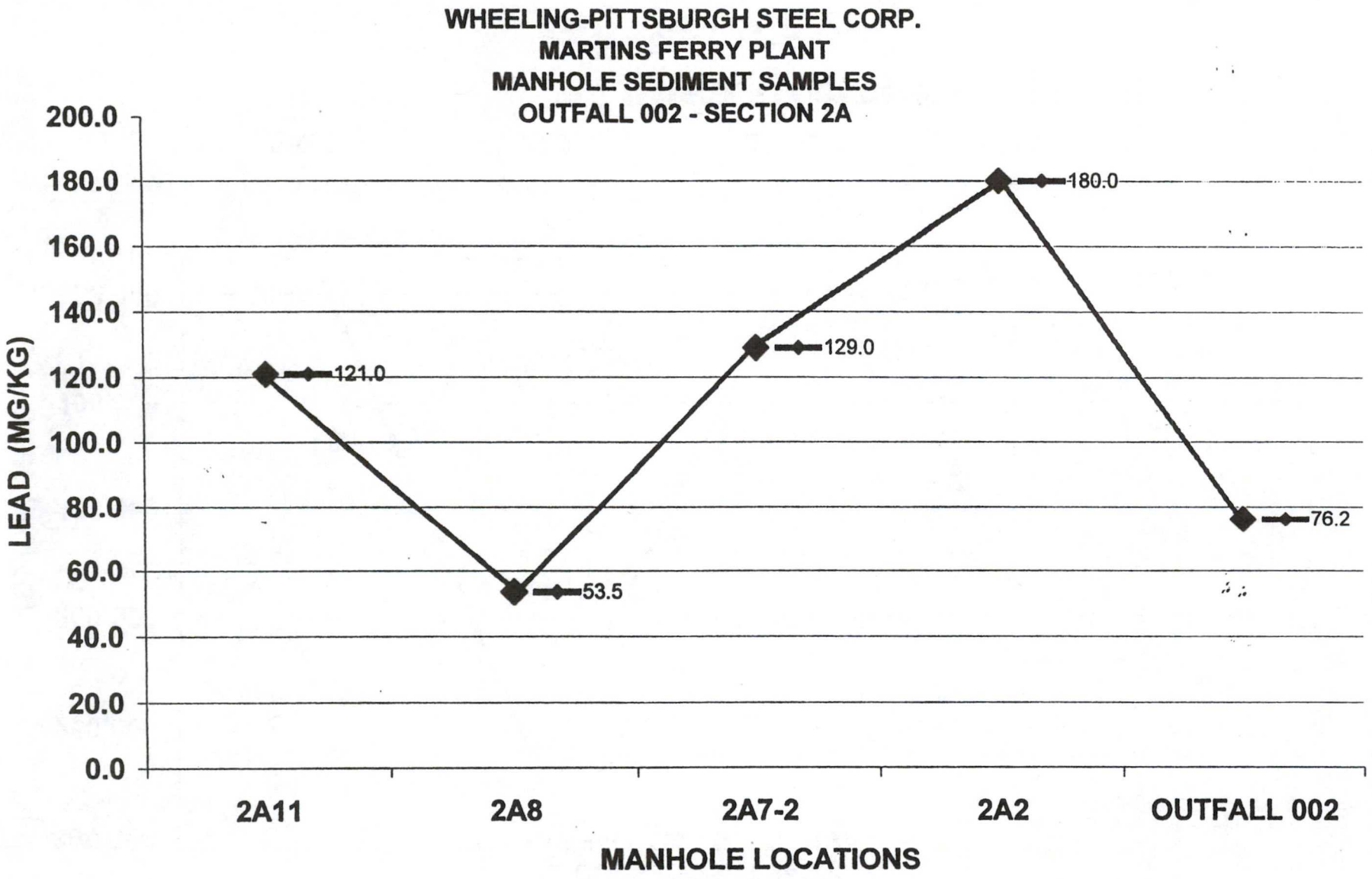
NOTE: MANHOLE 3A-4 WAS NOT READILY ACCESSIBLE. MANHOLE WOULD NEED TO BE EXCAVATED.
OUTFALL PIPE COULD NOT BE LOCATED.

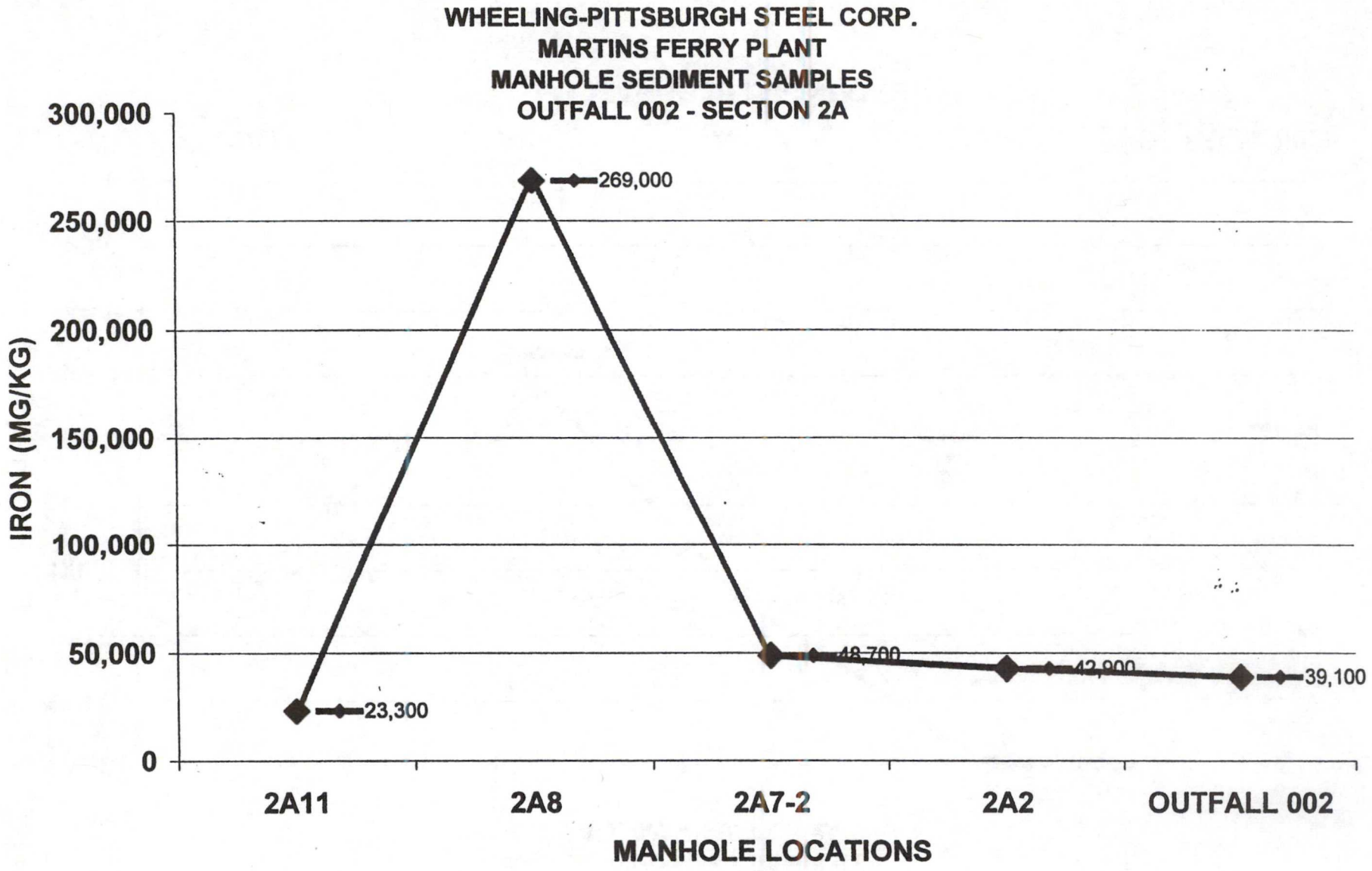
SEWER SECTION	MANHOLE #	(MG/KG) ZINC	(MG/KG) LEAD	(MG/KG) IRON	(MG/KG) COPPER	(MG/KG) CHROMIUM	(MG/KG) ARSENIC
OUTFALL 004 - SECTION 4A	NO MANHOLES COULD BE FOUND. DRAWINGS INDICATE OUTFALL 004 SEWER TIED INTO OUTFALL 005 SYSTEM.						

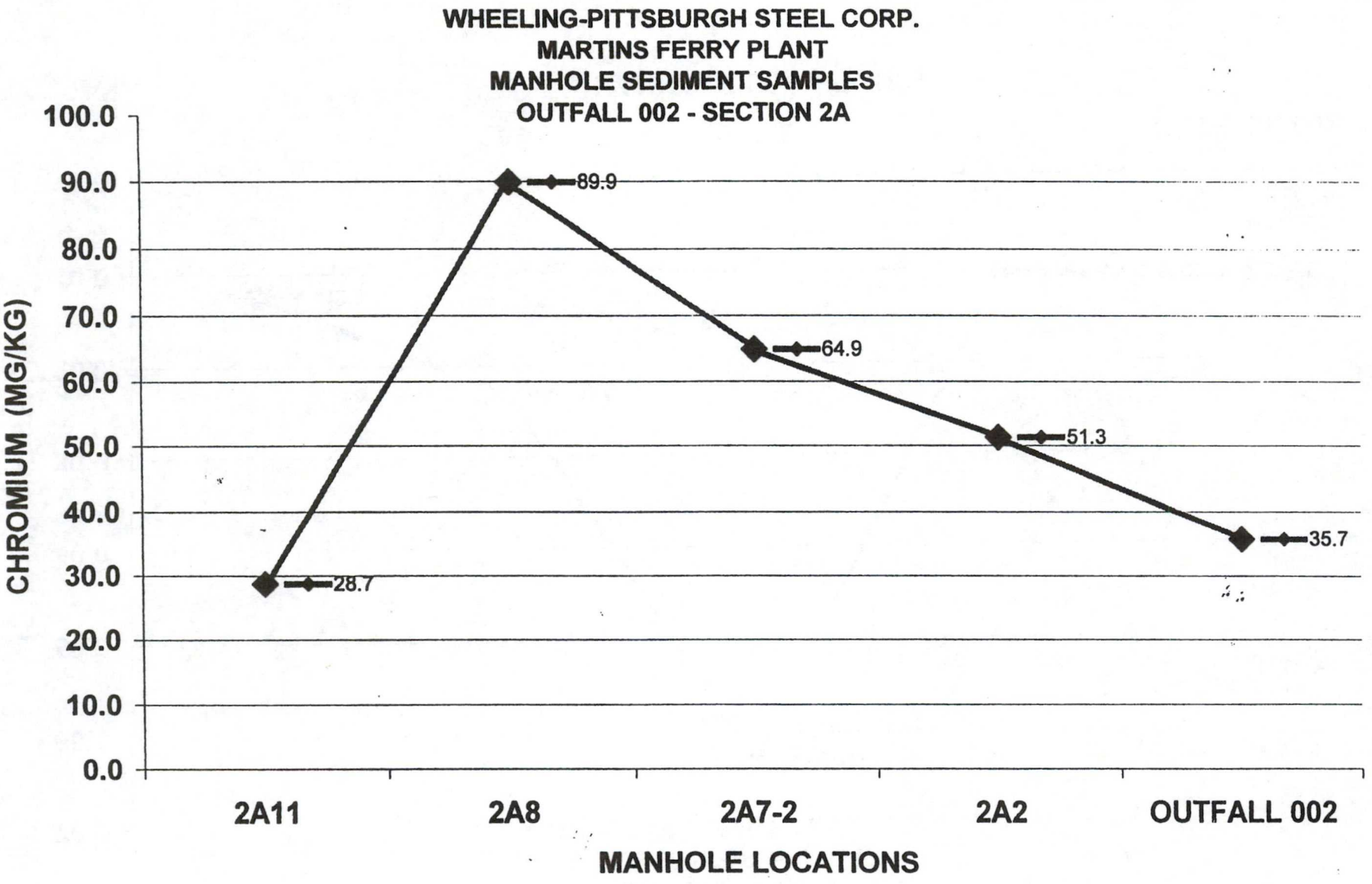
SEWER SECTION	MANHOLE #	(MG/KG) ZINC	(MG/KG) LEAD	(MG/KG) IRON	(MG/KG) COPPER	(MG/KG) CHROMIUM	(MG/KG) ARSENIC
OUTFALL 005 - SECTION 5A	5A3	NO SEDIMENT IN MANHOLE.					
	5A2	NO SEDIMENT IN MANHOLE.					
	5A1	MANHOLE COULD NOT BE FOUND.					
	OUTFALL 005	NO SEDIMENT IN OUTFALL PIPE. SEWER APPEARS TO BE CLEAN.					

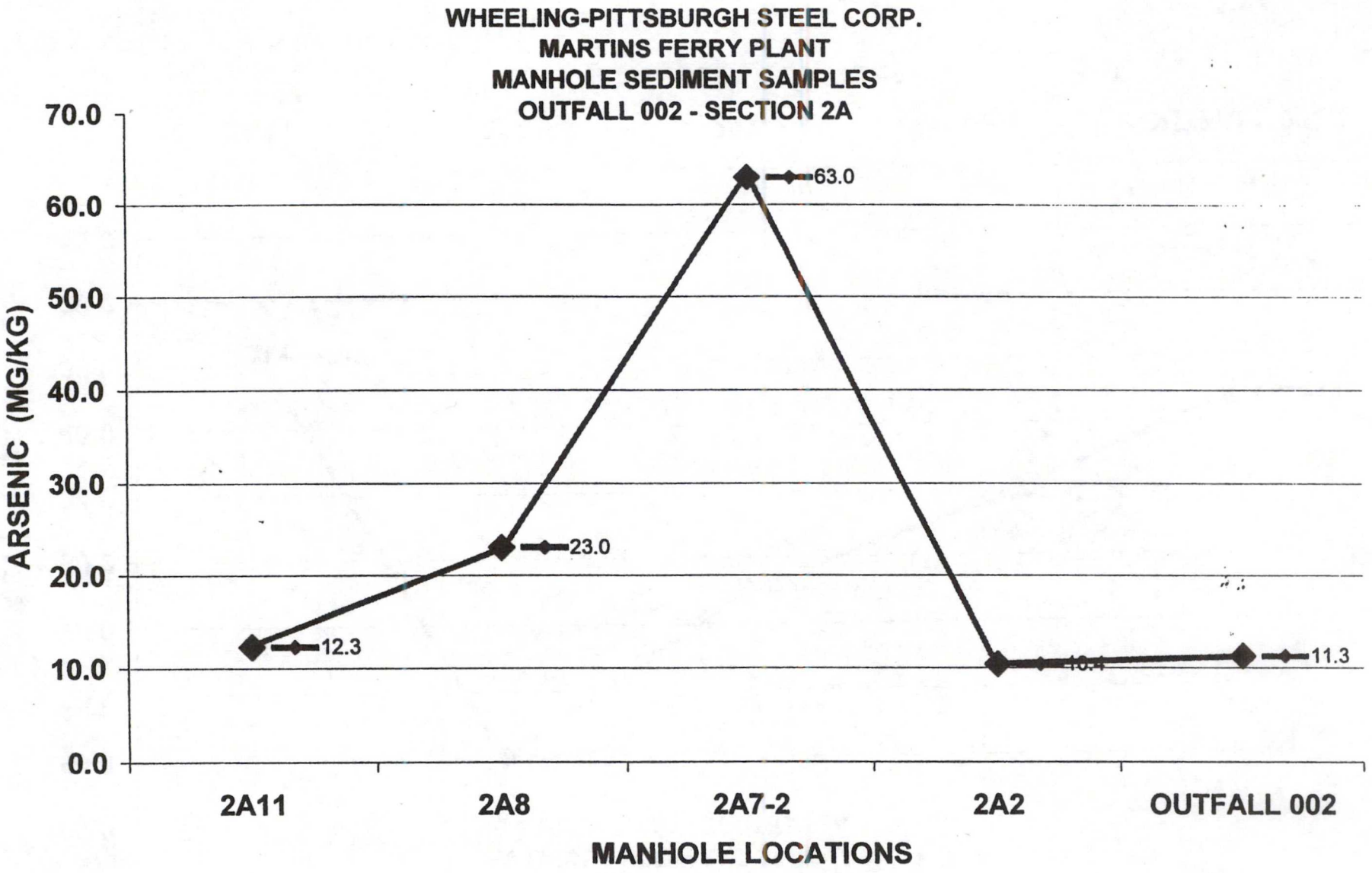

WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2A
ZINC (MG/KG)
9000
8000
7000
6000
5000
4000
3000
2000
1000
0
299
3080
8070
6010
1870
2A11
2A8
2A7-2
2A2
OUTFALL 002
MANHOLE LOCATIONS


WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2A
COPPER (MG/KG)
450.0
400.0
350.0
300.0
250.0
200.0
150.0
100.0
50.0
0.0
381.0
203.0
87.0
58.5
42.4
2A11
2A8
2A7-2
2A2
OUTFALL 002
MANHOLE LOCATIONS

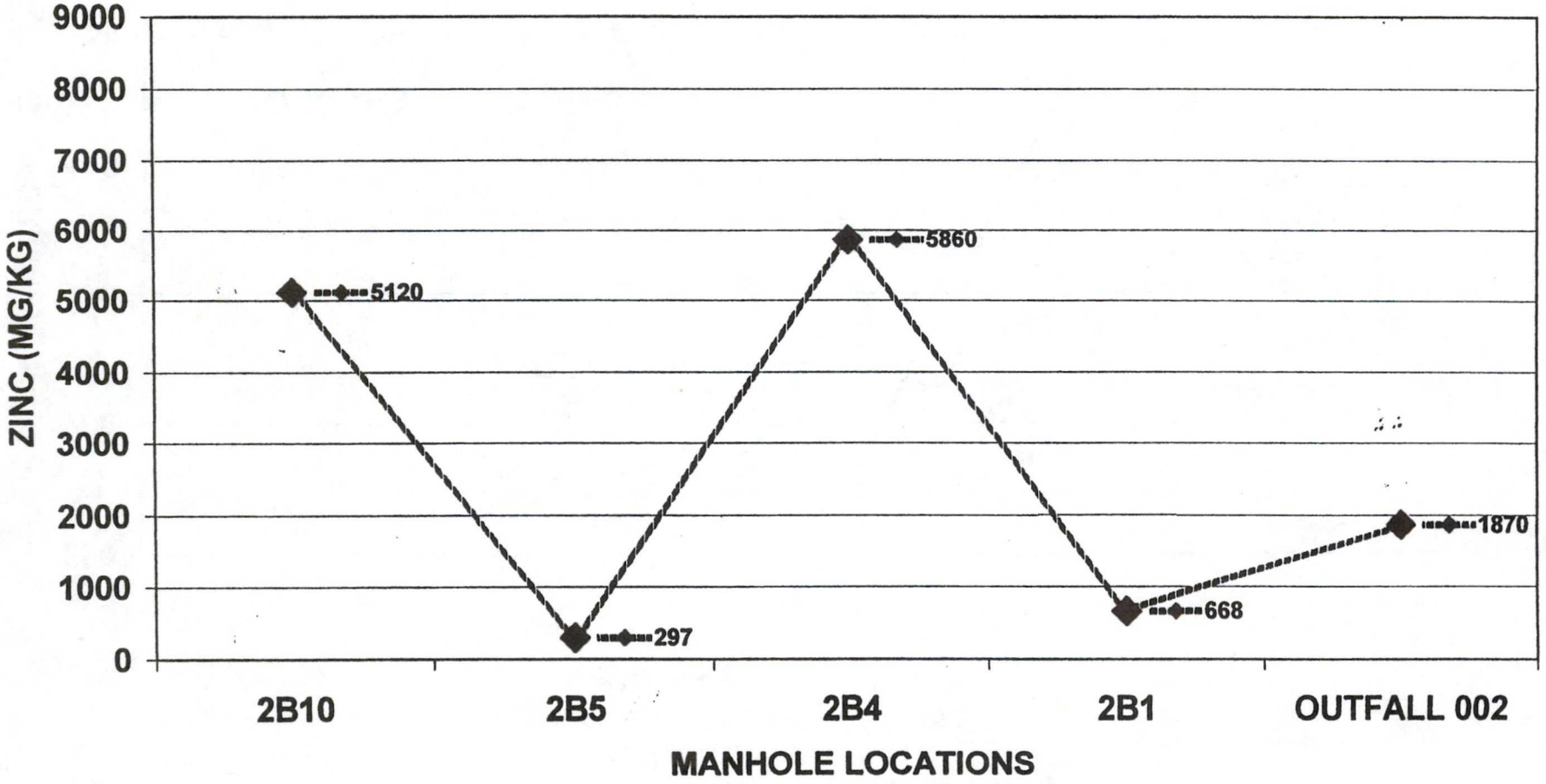

WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2A
LEAD (MG/KG)
200.0
180.0
160.0
140.0
120.0
100.0
80.0
60.0
40.0
20.0
0.0
121.0
53.5
129.0
180.0
76.2
2A11
2A8
2A7-2
2A2
OUTFALL 002
MANHOLE LOCATIONS


WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2A
IRON (MG/KG)
300,000
250,000
200,000
150,000
100,000
50,000
0
269,000
23,300
48,700
42,900
39,100
2A11
2A8
2A7-2
2A2
OUTFALL 002
MANHOLE LOCATIONS

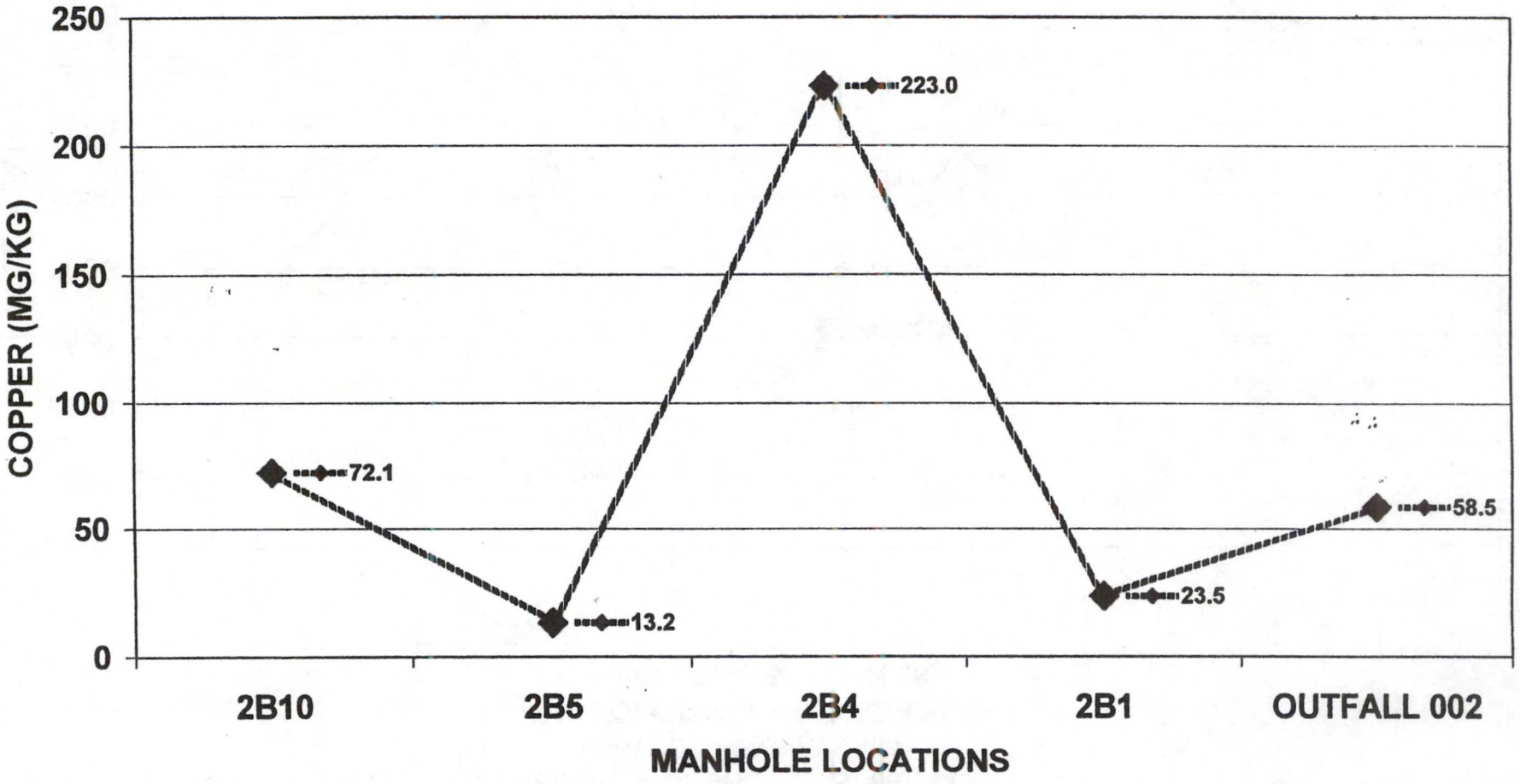

WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2A
CHROMIUM (MG/KG)
100.0
90.0
80.0
70.0
60.0
50.0
40.0
30.0
20.0
10.0
0.0
89.9
64.9
51.3
35.7
28.7
2A11
2A8
2A7-2
2A2
OUTFALL 002
MANHOLE LOCATIONS


WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2A
ARSENIC (MG/KG)
70.0
60.0
50.0
40.0
30.0
20.0
10.0
0.0
12.3
23.0
63.0
11.3
2A11
2A8
2A7-2
2A2
OUTFALL 002
MANHOLE LOCATIONS

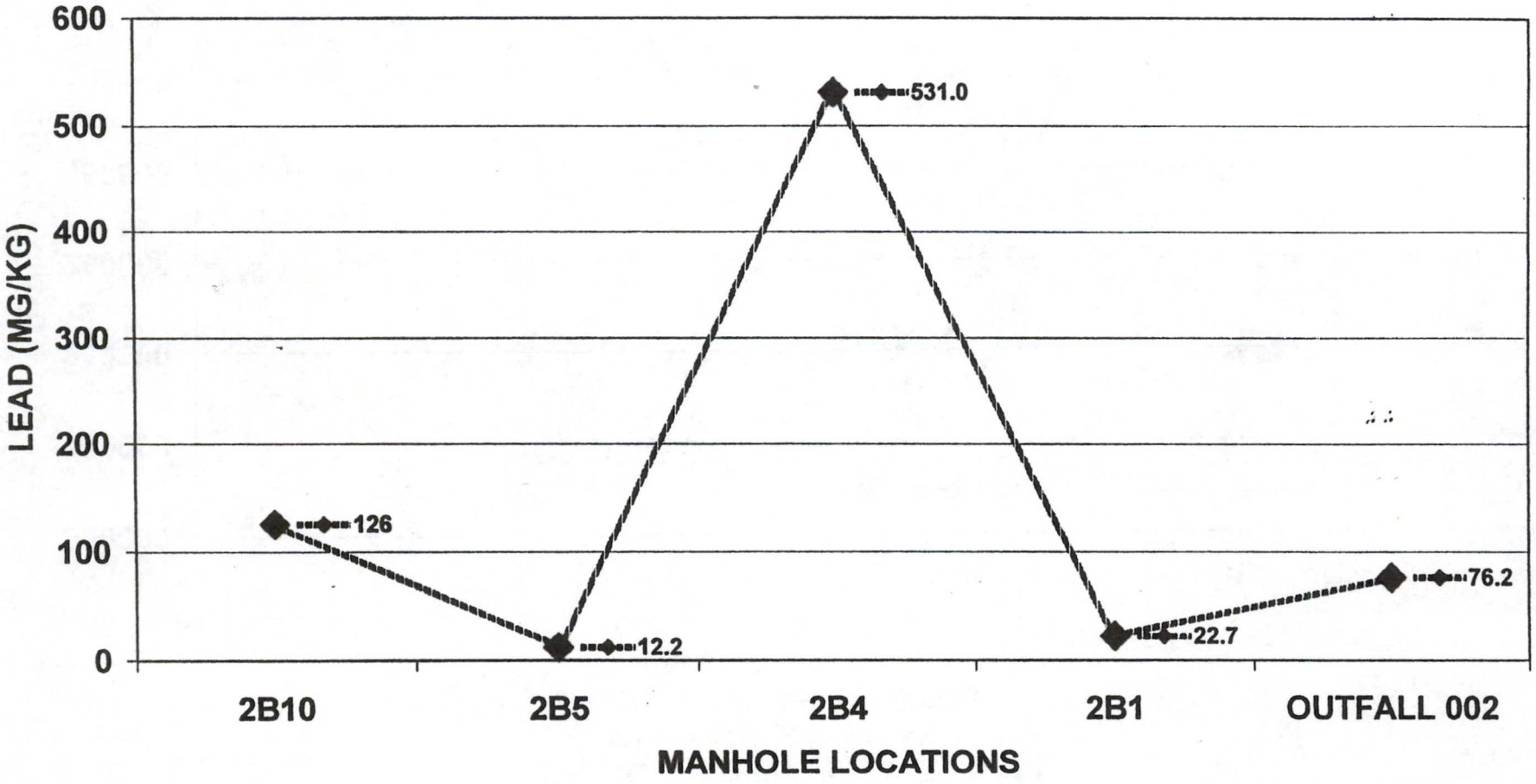
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2B



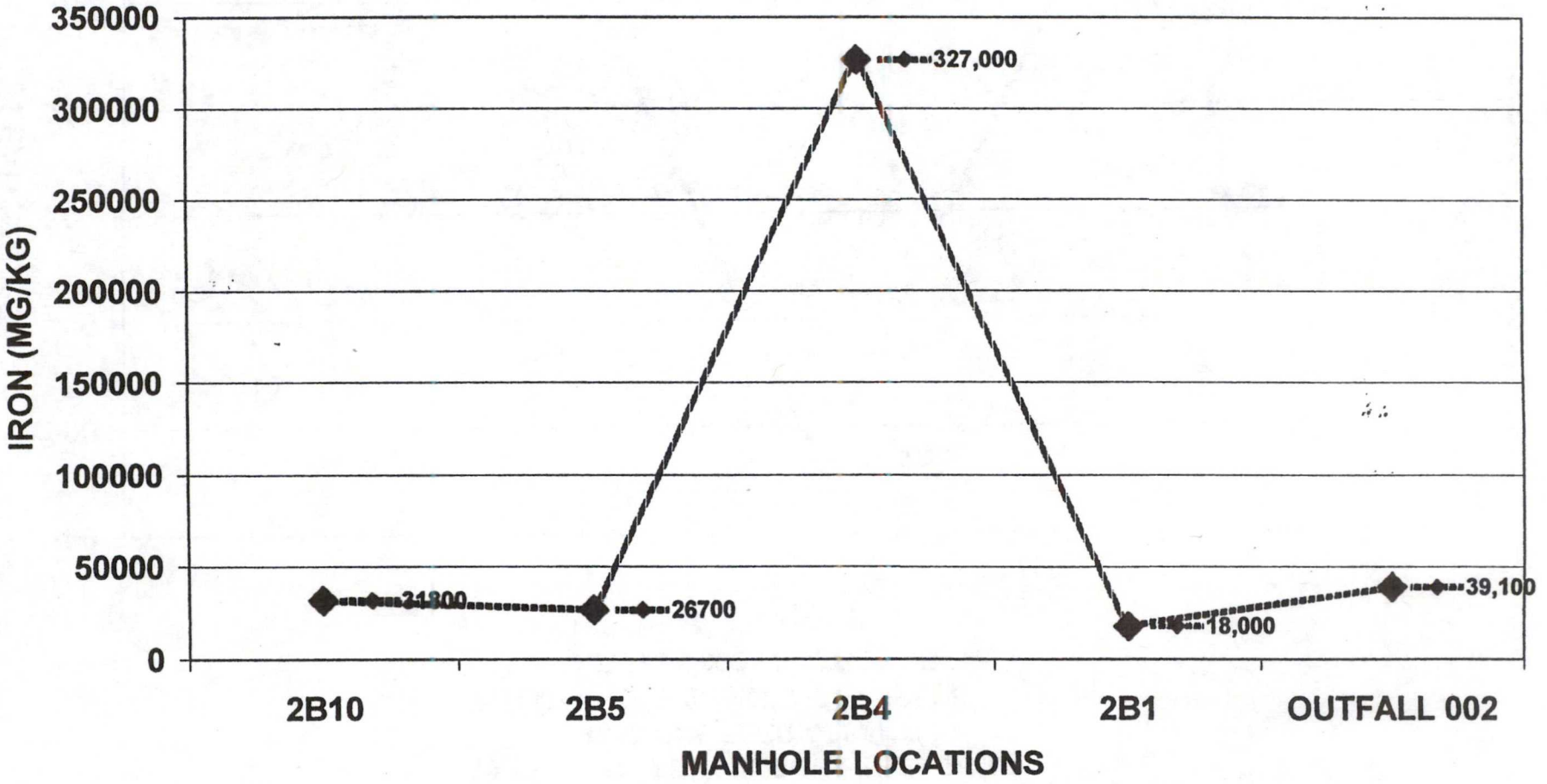
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2B



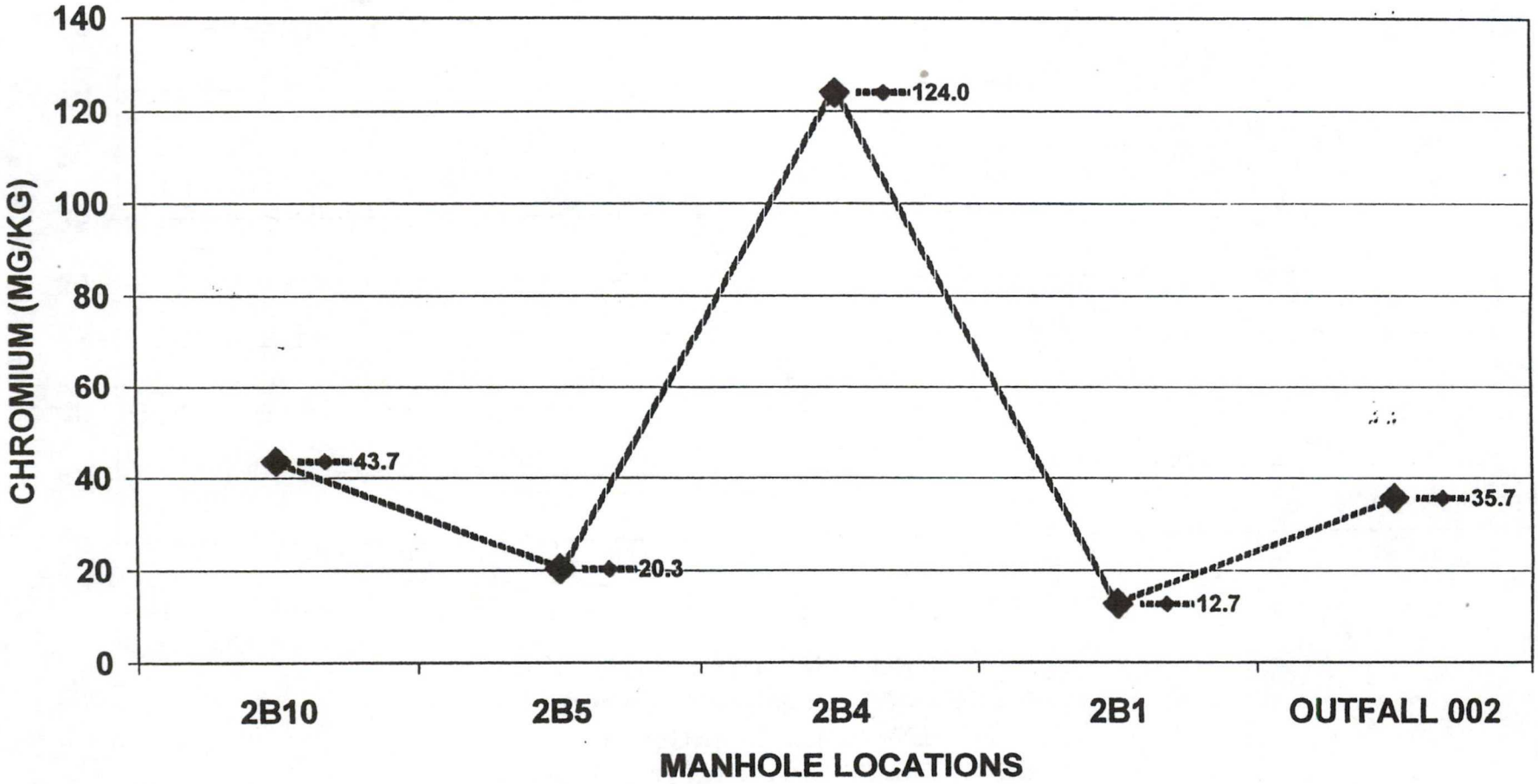
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2B



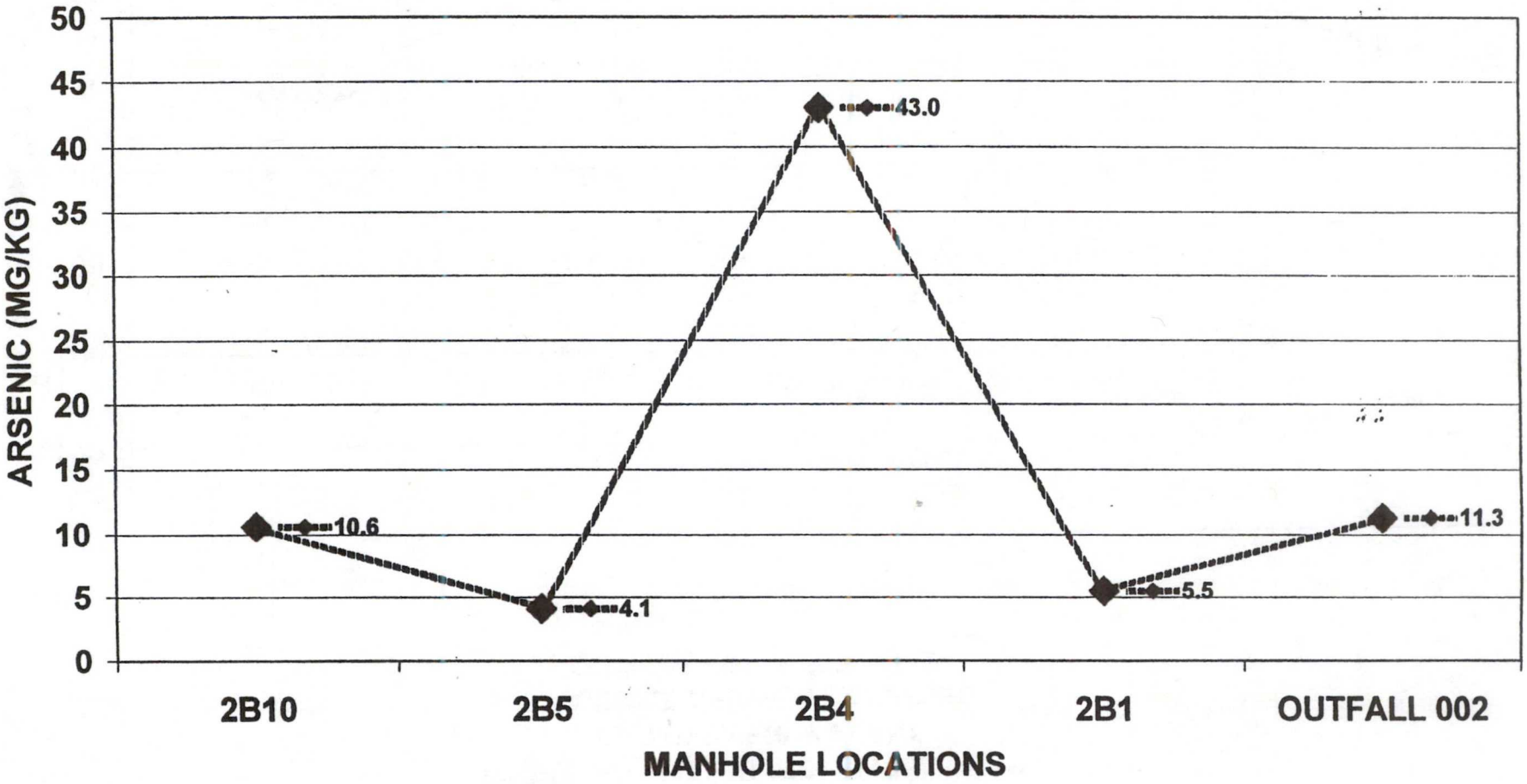
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2B

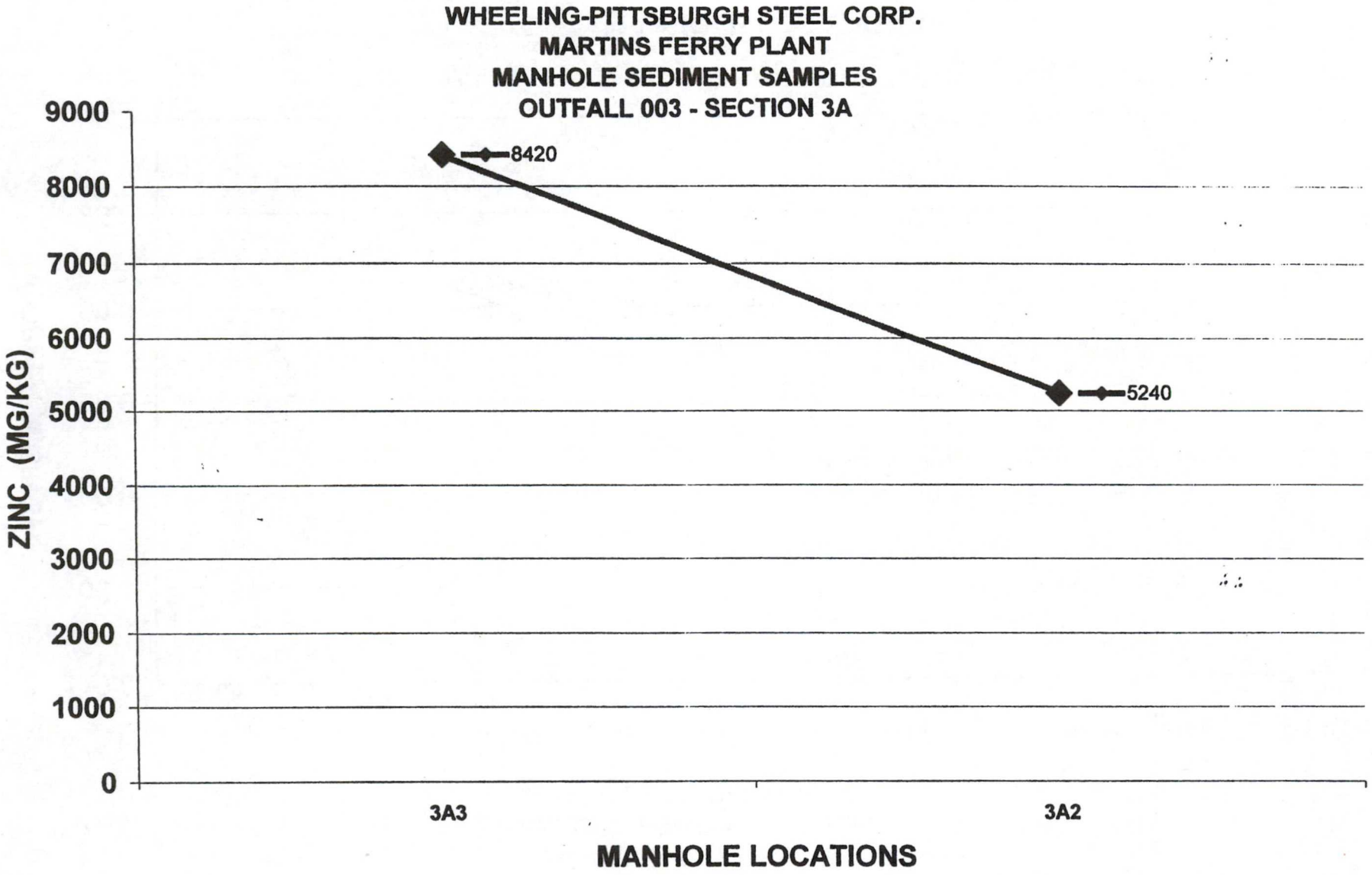


WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2B

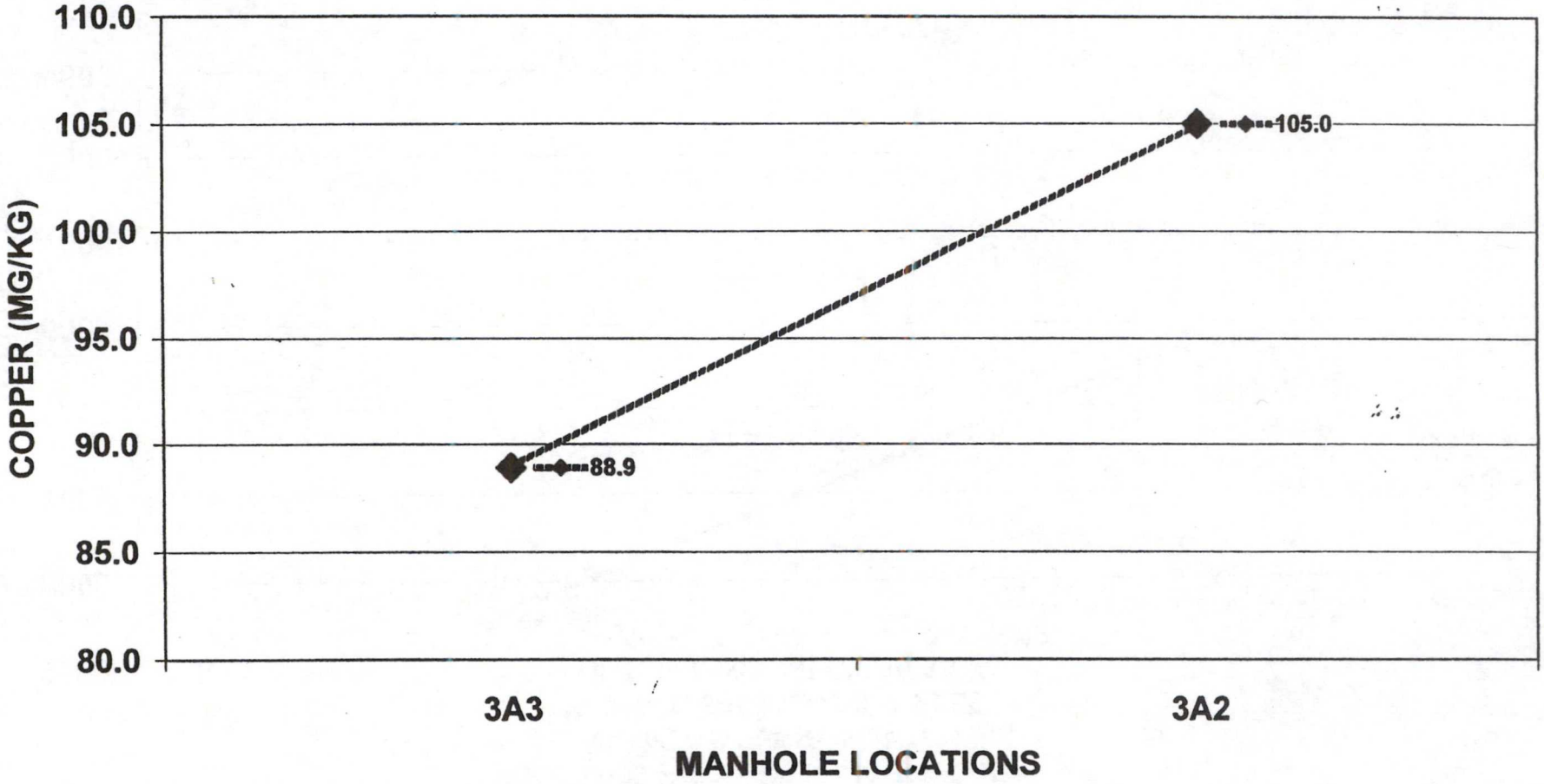


WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 002 - SECTION 2B

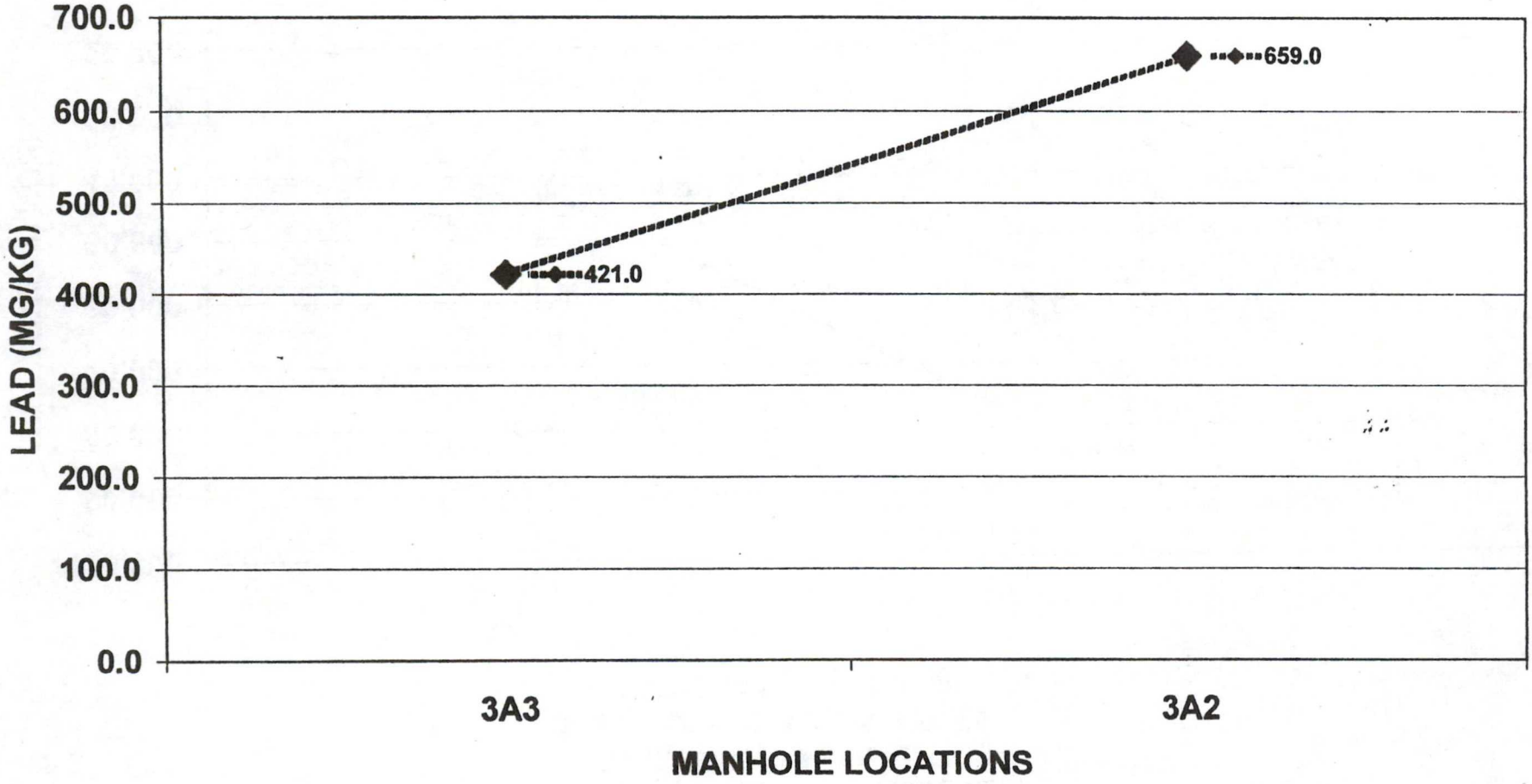



WHEELING-PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 003 - SECTION 3A
9000
8000
7000
6000
5000
4000
3000
2000
1000
0
ZINC (MG/KG)
8420
5240
3A3
3A2
MANHOLE LOCATIONS

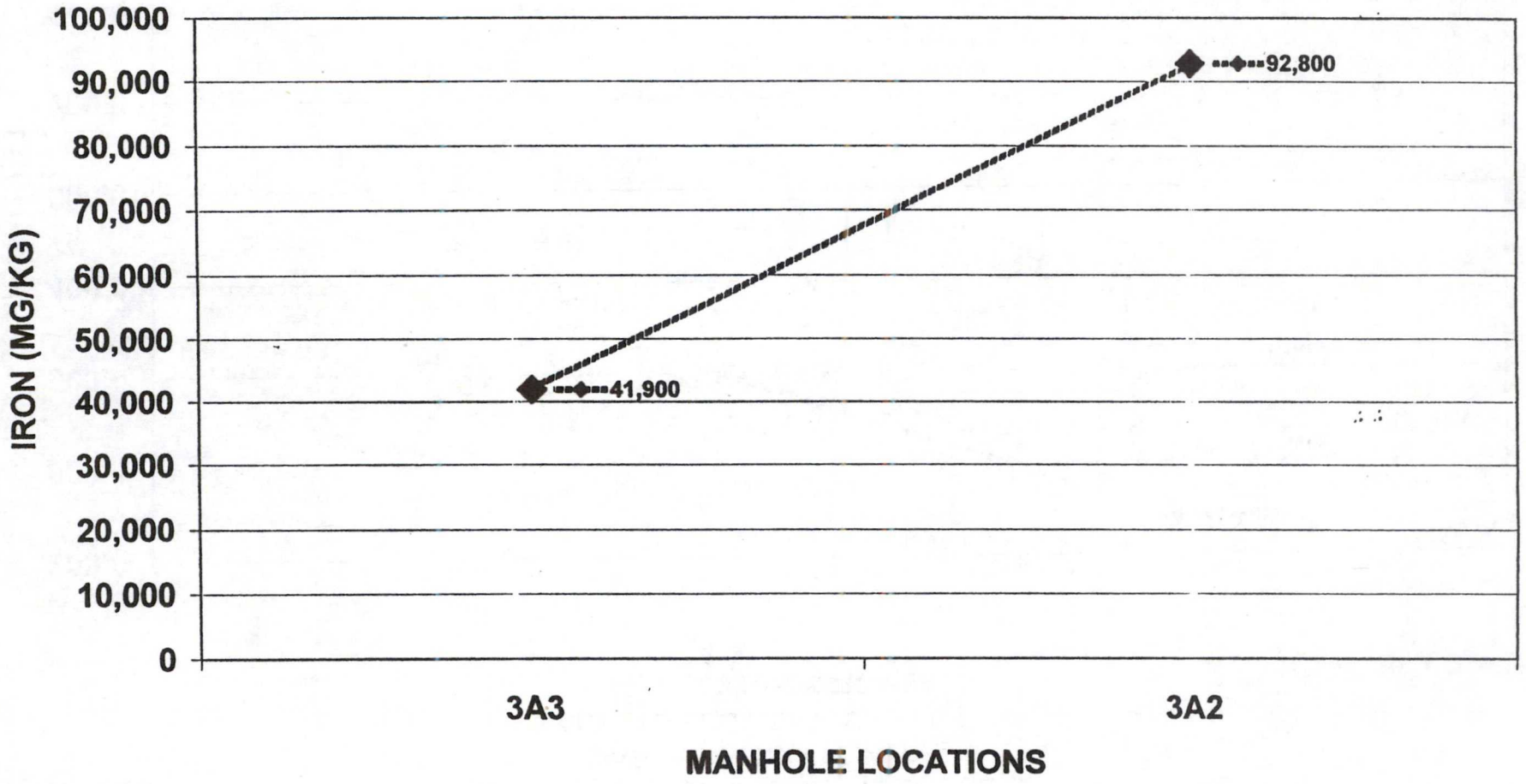
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 003 - SECTION 3A



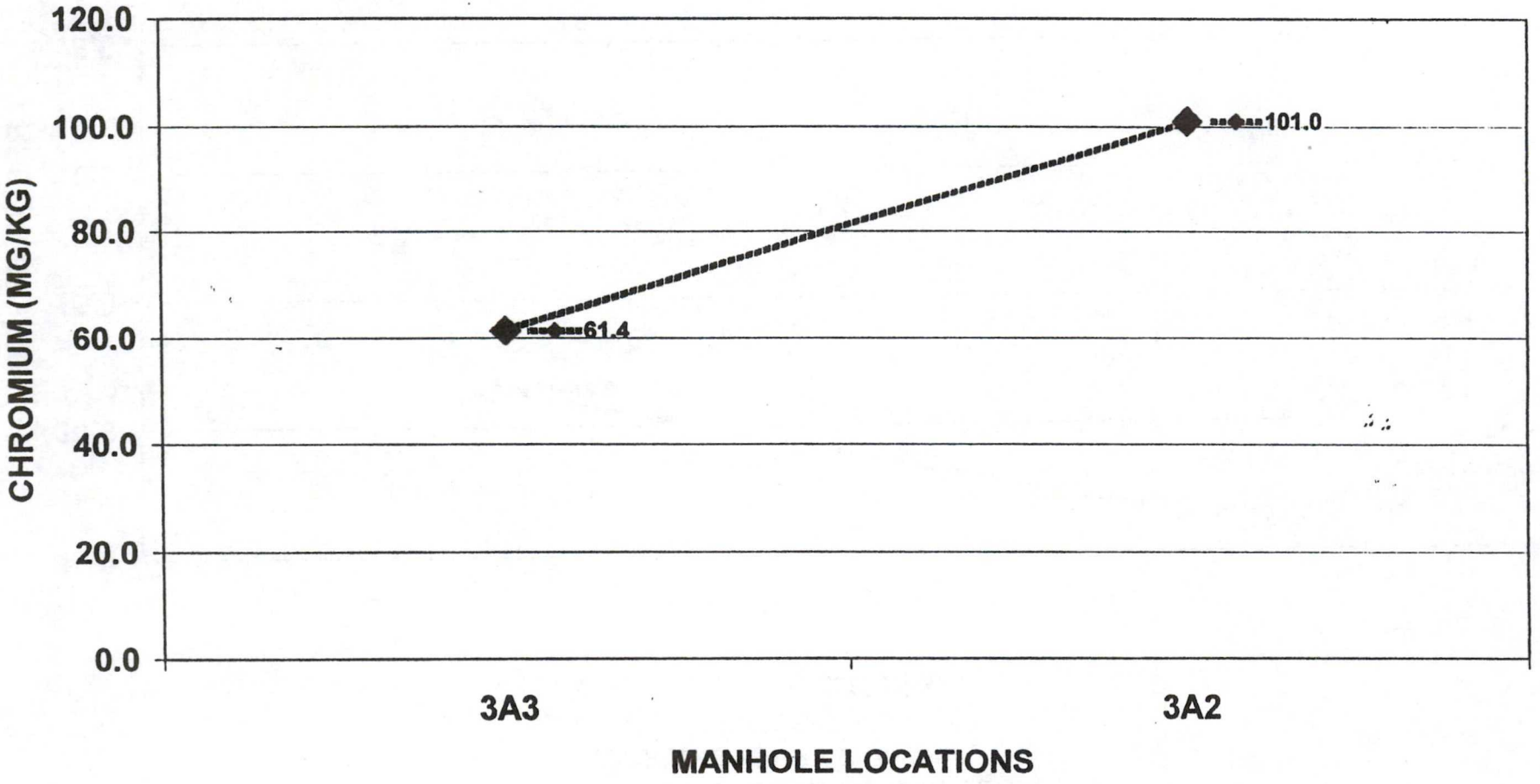
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 003 - SECTION 3A



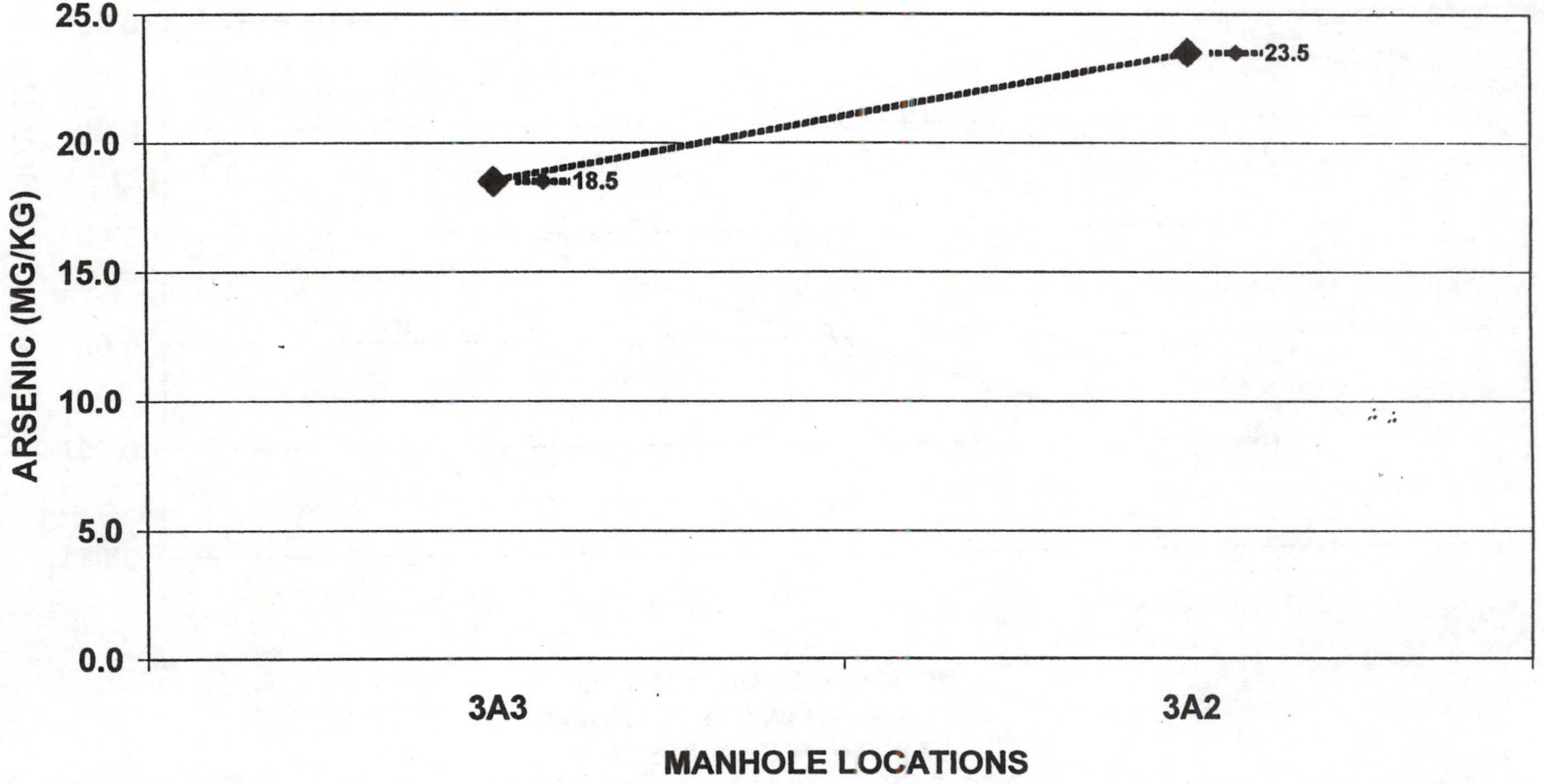
WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 003 - SECTION 3A



WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 003 - SECTION 3A



WHEELING - PITTSBURGH STEEL CORP.
MARTINS FERRY PLANT
MANHOLE SEDIMENT SAMPLES
OUTFALL 003 - SECTION 3A



SEVERN TRENT STL

STL Pittsburgh
450 William Pitt Way
Pittsburgh, PA 15238

Tel: 412 820 8380 Fax: 412 820 2080
www.stl-inc.com

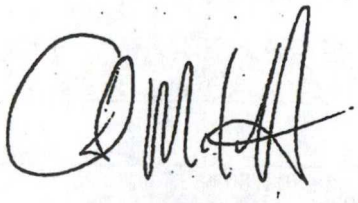
ANALYTICAL REPORT

Lot #: C3J160325

Tom Waligura

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.



Christina M. Kovitch
Project Manager

October 24, 2003

SEVERN TRENT STL

ACCREDITED IN ACCORDANCE WITH nelac

NELAC REPORTING:

The format and content of the attached report meets NELAC standards and guidelines except as noted in the narrative. The table below presents a summary of the certifications held by STL Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is New York State DOH. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State/Program	Certificate #	Program Types	STL Pittsburgh
NFESC	NA	NAVY	X
USACE	NA	Corps of Engineers	X
US Dept of Agriculture	(#S-46425)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW HW	X X
Connecticut	(#PH-0688)	WW HW	X X
Florida – nelac	(#E87660)	WW HW	X X
Illinois – nelac	(#200005)	WW HW	X X
Kansas – nelac	(#E-10350)	WW HW	X X
Louisiana – nelac	(#93200)	WW HW	X X
New Hampshire – nelac	(#203002)	WW	X
New Jersey – nelac	(PA-005)	WW HW	X X
New York – nelac	(#11182)	WW HW	X X
North Carolina	(#434)	WW HW	X X
Ohio Vap	(#CL0063)	WW HW	X X
South Carolina	(#89014001)	WW HW	X X
Utah – nelac	(STLP)	WW HW	X X
West Virginia	(#142)	WW HW	X X
Wisconsin	998027800	WW HW	X X

The codes utilized for program types are described below:

HW Hazardous Waste certification.
WW Non-potable Water and/or Wastewater certification
X Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

CASE NARRATIVE
WHEELING PITTSBURGH STEEL

LOT # C3J160325

Sample Receiving:
STL Pittsburgh received samples on October 16, 2003. The cooler was received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

Metals:
Several samples were over the instruments linear range for zinc and required a dilution.

Sample 2B-4 was over the instruments linear range for iron and required a dilution. The sample was also analyzed at a dilution for lead due to inter-element corrections associated with iron.

The matrix spike duplicate recovered outside of the control limits for chromium.

For the matrix spike and matrix spike duplicate, iron and zinc recoveries were not calculated due to the concentration of analyte in the sample being >4 times the concentration of spike added.

General Chemistry:
There were no problems associated with the analysis.

METHODS SUMMARY

C3J160325

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Total Residue as Percent Solids	MCAWW 160.3 MOD	MCAWW 160.3 MOD
Trace Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 3050B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C3J160325

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
F2PQN	001	2A7-2	10/14/03	10:00
F2PQ1	002	2A-11	10/14/03	10:15
F2PQ5	003	2B-4	10/14/03	11:00
F2PQ9	004	OUTFALL 002	10/14/03	11:30

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

Chain of Custody Record

SEVERN TRENT SERVICES — Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
WHEELING PITTSBURGH STEEL			145140
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page ____ of ____**
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	
Project Name and Location (State)	**Carrier/Waybill Number**		
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Containers & Preservatives: Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	Analysis: % by weight	Zn, Pb, Cu	Cr, Ar, Fe	if DRY sample	Special Instructions/ Conditions of Receipt
2A7--2	10/14/03	10:00				X	X						X				
2A-11	↓	10:15				X	X						↓				
2B-4		11:00				X	X										
OUTFALL 002		11:30				X	X										

Possible Hazard Identification
☒ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☒ Archive For 1 Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☐ 7 Days ☐ 14 Days ☐ 21 Days ☒ Other STD.

QC Requirements (Specify)

	Relinquished By	Date	Time	Received By	Date	Time
1.	Bill Polomik	10/16/03	1800		10-16-03	1000
2.		10-16-03	1510		10/16/03	1510
3.						

Comments
% by weight of dry sample. Results to Tom Waligura PH 304-234-2682 FAX 304-234-2613

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

WHEELING PITTSBURGH STEEL

Client Sample ID: 2A7-2

TOTAL Metals

Lot-Sample #...: C3J160325-001 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 0.75

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 3293132						
Arsenic	6.3	1.0	mg/kg	SW846 6010B	10/20-10/21/03	F2PQN1AA
		Dilution Factor: 1		Analysis Time..: 23:33	MS Run #.....: 3293032	
Chromium	64.9	0.50	mg/kg	SW846 6010B	10/20-10/22/03	F2PQN1AC
		Dilution Factor: 1		Analysis Time..: 18:42	MS Run #.....: 3293032	
Copper	87.0	2.5	mg/kg	SW846 6010B	10/20-10/21/03	F2PQN1AD
		Dilution Factor: 1		Analysis Time..: 23:33	MS Run #.....: 3293032	
Iron	48700	10.1	mg/kg	SW846 6010B	10/20-10/21/03	F2PQN1AE
		Dilution Factor: 1		Analysis Time..: 23:33	MS Run #.....: 3293032	
Lead	129	0.30	mg/kg	SW846 6010B	10/20-10/21/03	F2PQN1AF
		Dilution Factor: 1		Analysis Time..: 23:33	MS Run #.....: 3293032	
Zinc	8070	10.1	mg/kg	SW846 6010B	10/20-10/22/03	F2PQN1AG
		Dilution Factor: 5		Analysis Time..: 18:47	MS Run #.....: 3293032	

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

WHEELING PITTSBURGH STEEL

Client Sample ID: 2A7-2

General Chemistry

Lot-Sample #...: C3J160325-001 Work Order #...: F2PQN Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 0.75

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	99.3		%	MCAWW 160.3 MOD	10/20-10/21/03	3293101

Dilution Factor: 1 Analysis Time..: 05:00 MS Run #.....: 3293009

WHEELING PITTSBURGH STEEL

Client Sample ID: 2A-11

TOTAL Metals

Lot-Sample #...: C3J160325-002 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 2.0

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 3293132						
Arsenic	12.3	1.0	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ11AA
		Dilution Factor: 1		Analysis Time..: 22:49	MS Run #.....: 3293032	
Chromium	28.7	0.51	mg/kg	SW846 6010B	10/20-10/22/03	F2PQ11AC
		Dilution Factor: 1		Analysis Time..: 17:41	MS Run #.....: 3293032	
Copper	42.4	2.6	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ11AD
		Dilution Factor: 1		Analysis Time..: 22:49	MS Run #.....: 3293032	
Iron	23300	10.2	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ11AE
		Dilution Factor: 1		Analysis Time..: 22:49	MS Run #.....: 3293032	
Lead	121	0.31	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ11AF
		Dilution Factor: 1		Analysis Time..: 22:49	MS Run #.....: 3293032	
Zinc	299	2.0	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ11AG
		Dilution Factor: 1		Analysis Time..: 22:49	MS Run #.....: 3293032	

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

WHEELING PITTSBURGH STEEL

Client Sample ID: 2A-11

General Chemistry

Lot-Sample #...: C3J160325-002 Work Order #...: F2PQ1 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 2.0

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	98.0		%	MCAWW 160.3 MOD	10/20-10/21/03	3293101

Dilution Factor: 1 Analysis Time..: 05:00 MS Run #.....: 3293009

WHEELING PITTSBURGH STEEL

Client Sample ID: 2B-4

TOTAL Metals

Lot-Sample #...: C3J160325-003 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 2.7

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 3293132						
Arsenic	43.0	1.0	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ51AA
		Dilution Factor: 1		Analysis Time..: 22:54	MS Run #.....: 3293032	
Chromium	124	0.51	mg/kg	SW846 6010B	10/20-10/22/03	F2PQ51AC
		Dilution Factor: 1		Analysis Time..: 17:58	MS Run #.....: 3293032	
Copper	223	2.6	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ51AD
		Dilution Factor: 1		Analysis Time..: 22:54	MS Run #.....: 3293032	
Iron	327000	103	mg/kg	SW846 6010B	10/20-10/22/03	F2PQ51AE
		Dilution Factor: 10		Analysis Time..: 18:03	MS Run #.....: 3293032	
Lead	531	3.1	mg/kg	SW846 6010B	10/20-10/22/03	F2PQ51AF
		Dilution Factor: 10		Analysis Time..: 18:03	MS Run #.....: 3293032	
Zinc	5860	20.6	mg/kg	SW846 6010B	10/20-10/22/03	F2PQ51AG
		Dilution Factor: 10		Analysis Time..: 18:03	MS Run #.....: 3293032	

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

WHEELING PITTSBURGH STEEL

Client Sample ID: 2B-4

General Chemistry

Lot-Sample #...: C3J160325-003 Work Order #...: F2PQ5 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 2.7

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	97.3		%	MCAWW 160.3 MOD	10/20-10/21/03	3293101

Dilution Factor: 1 Analysis Time..: 05:00 MS Run #.....: 3293009

WHEELING PITTSBURGH STEEL

Client Sample ID: OUTFALL 002

TOTAL Metals

Lot-Sample #...: C3J160325-004 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 1.9

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 3293132						
Arsenic	11.3	1.0	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ91AA
		Dilution Factor: 1		Analysis Time..: 23:00	MS Run #.....: 3293032	
Chromium	35.7	0.51	mg/kg	SW846 6010B	10/20-10/22/03	F2PQ91AC
		Dilution Factor: 1		Analysis Time..: 18:09	MS Run #.....: 3293032	
Copper	58.5	2.5	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ91AD
		Dilution Factor: 1		Analysis Time..: 23:00	MS Run #.....: 3293032	
Iron	39100	10.2	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ91AE
		Dilution Factor: 1		Analysis Time..: 23:00	MS Run #.....: 3293032	
Lead	76.2	0.31	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ91AF
		Dilution Factor: 1		Analysis Time..: 23:00	MS Run #.....: 3293032	
Zinc	1870	2.0	mg/kg	SW846 6010B	10/20-10/21/03	F2PQ91AG
		Dilution Factor: 1		Analysis Time..: 23:00	MS Run #.....: 3293032	

NOTE(S):

Results and reporting limits have been adjusted for dry weight.

WHEELING PITTSBURGH STEEL

Client Sample ID: OUTFALL 002

General Chemistry

Lot-Sample #...: C3J160325-004 Work Order #...: F2PQ9 Matrix.....: SOLID
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 1.9

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids	98.1		%	MCAWW 160.3 MOD	10/20-10/21/03	3293101

Dilution Factor: 1 Analysis Time..: 05:00 MS Run #.....: 3293009

METHOD BLANK REPORT

TOTAL Metals

Client Lot #...: C3J160325 **Matrix.....:** SOLID

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MB Lot-Sample #: C3J200000-132 **Prep Batch #...:** 3293132						
Arsenic	ND	1.0	mg/kg	SW846 6010B	10/20-10/21/03	F2XX01AA
		Dilution Factor: 1				
		Analysis Time..: 22:38				
Chromium	ND	0.50	mg/kg	SW846 6010B	10/20-10/22/03	F2XX01AC
		Dilution Factor: 1				
		Analysis Time..: 17:30				
Copper	ND	2.5	mg/kg	SW846 6010B	10/20-10/21/03	F2XX01AD
		Dilution Factor: 1				
		Analysis Time..: 22:38				
Iron	ND	10.0	mg/kg	SW846 6010B	10/20-10/21/03	F2XX01AE
		Dilution Factor: 1				
		Analysis Time..: 22:38				
Lead	ND	0.30	mg/kg	SW846 6010B	10/20-10/21/03	F2XX01AF
		Dilution Factor: 1				
		Analysis Time..: 22:38				
Zinc	ND	2.0	mg/kg	SW846 6010B	10/20-10/21/03	F2XX01AG
		Dilution Factor: 1				
		Analysis Time..: 22:38				

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

LABORATORY CONTROL SAMPLE EVALUATION REPORT

TOTAL Metals

Client Lot #....: C3J160325 Matrix.....: SOLID

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
LCS Lot-Sample#: C3J200000-132		Prep Batch #...: 3293132			
Arsenic	95	(80 - 120)	SW846 6010B	10/20-10/21/03	F2XX01AH
		Dilution Factor: 1		Analysis Time..: 22:43	
Chromium	100	(80 - 120)	SW846 6010B	10/20-10/22/03	F2XX01AJ
		Dilution Factor: 1		Analysis Time..: 17:36	
Copper	99	(80 - 120)	SW846 6010B	10/20-10/21/03	F2XX01AK
		Dilution Factor: 1		Analysis Time..: 22:43	
Iron	100	(80 - 120)	SW846 6010B	10/20-10/21/03	F2XX01AL
		Dilution Factor: 1		Analysis Time..: 22:43	
Lead	96	(80 - 120)	SW846 6010B	10/20-10/21/03	F2XX01AM
		Dilution Factor: 1		Analysis Time..: 22:43	
Zinc	97	(80 - 120)	SW846 6010B	10/20-10/21/03	F2XX01AN
		Dilution Factor: 1		Analysis Time..: 22:43	

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

MATRIX SPIKE SAMPLE EVALUATION REPORT

TOTAL Metals

Client Lot #...: C3J160325 **Matrix.....:** SOLID
Date Sampled...: 10/14/03 **Date Received..:** 10/16/03

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION-ANALYSIS DATE	WORK ORDER #
MS Lot-Sample #: C3J160325-004 **Prep Batch #...:** 3293132							
						% Moisture.....: 1.9	
Arsenic	78	(75 - 125)			SW846 6010B	10/20-10/21/03	F2PQ91AJ
	80	(75 - 125)	2.3	(0-20)	SW846 6010B	10/20-10/21/03	F2PQ91AK
		Dilution Factor: 1					
		Analysis Time..: 23:22					
		MS Run #.....: 3293032					
Chromium	89	(75 - 125)			SW846 6010B	10/20-10/22/03	F2PQ91AL
	73 N	(75 - 125)	6.1	(0-20)	SW846 6010B	10/20-10/22/03	F2PQ91AM
		Dilution Factor: 1					
		Analysis Time..: 18:20					
		MS Run #.....: 3293032					
Copper	108	(75 - 125)			SW846 6010B	10/20-10/21/03	F2PQ91AN
	97	(75 - 125)	3.5	(0-20)	SW846 6010B	10/20-10/21/03	F2PQ91AP
		Dilution Factor: 1					
		Analysis Time..: 23:22					
		MS Run #.....: 3293032					
Iron	NC	(75 - 125)			SW846 6010B	10/20-10/21/03	F2PQ91AQ
	NC	(75 - 125)		(0-20)	SW846 6010B	10/20-10/21/03	F2PQ91AR
		Dilution Factor: 1					
		Analysis Time..: 23:22					
		MS Run #.....: 3293032					
Lead	102	(75 - 125)			SW846 6010B	10/20-10/21/03	F2PQ91AT
	91	(75 - 125)	4.2	(0-20)	SW846 6010B	10/20-10/21/03	F2PQ91AU
		Dilution Factor: 1					
		Analysis Time..: 23:22					
		MS Run #.....: 3293032					
Zinc	NC	(75 - 125)			SW846 6010B	10/20-10/22/03	F2PQ91AV
	NC	(75 - 125)		(0-20)	SW846 6010B	10/20-10/22/03	F2PQ91AW
		Dilution Factor: 2					
		Analysis Time..: 18:25					
		MS Run #.....: 3293032					

NOTE(S):

Calculations are performed before rounding to avoid round-off errors in calculated results.

Results and reporting limits have been adjusted for dry weight.

N Spiked analyte recovery is outside stated control limits.

NC The recovery and/or RPD were not calculated.

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: C3J160325 Work Order #...: F2PQN-SMP Matrix.....: SOLID
F2PQN-DUP
Date Sampled...: 10/14/03 Date Received..: 10/16/03
% Moisture.....: 0.75

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION-ANALYSIS DATE	PREP BATCH #
Percent Solids						SD Lot-Sample #:	C3J160325-001	
	99.3	99.3	%	0.060	(0-20)	MCAWW 160.3 MOD	10/20-10/21/03	3293101

Dilution Factor: 1 Analysis Time..: 05:00 MS Run Number..: 3293009

SEVERN TRENT STL

STL Pittsburgh
450 William Pitt Way
Pittsburgh, PA 15238

Tel: 412 820 8380 Fax: 412 820 2080
www.stl-inc.com

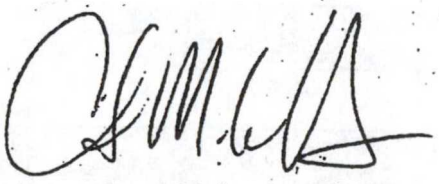
ANALYTICAL REPORT

Lot #: C3K030120

Tom Waligura

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.



Christina M. Kovitch
Project Manager

November 10, 2003

SEVERN TRENT STL

ACCREDITED IN ACCORDANCE WITH nelac

NELAC REPORTING:

The format and content of the attached report meets NELAC standards and guidelines except as noted in the narrative. The table below presents a summary of the certifications held by STL Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is New York State DOH. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State/Program	Certificate #	Program Types	STL Pittsburgh
NFESC	NA	NAVY	X
USACE	NA	Corps of Engineers	X
US Dept of Agriculture	(#S-46425)	Foreign Soil Import Permit	X
Arizona	(AZ0022)	WW HW	X
Connecticut	(#PH-0688)	WW HW	X X
Florida – nelac	(E87660)	WW HW	X
Illinois – nelac	(#200005)	WW HW	X X
Kansas – nelac	(E-10350)	WW HW	X
Louisiana – nelac	(#93200)	WW HW	X X
New Hampshire – nelac	(#203002)	WW	X
New Jersey – nelac	(PA-005)	WW HW	X X
New York – nelac	(10982)	WW HW	X X
North Carolina	(#434)	WW HW	X X
Ohio Vap	(#CL0065)	WW HW	X
South Carolina	(#89014001)	WW HW	X X
Utah – nelac	(STLP)	WW HW	X X
West Virginia	(#142)	WW HW	X X
Wisconsin	(#s - 998027800)	WW HW	X X

The codes utilized for program types are described below:

HW	Hazardous Waste certification
WW	Non-potable Water and/or Wastewater certification
X	Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

CASE NARRATIVE
WHEELING PITTSBURGH STEEL

LOT # C3K030120

Sample Receiving:
STL Pittsburgh received one sample on November 3, 2003. The cooler was received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

Metals:
Several samples were over the instruments linear range for zinc and required a dilution.

Samples MH 2A-8 and MH 3A-2 were over the instruments linear range for iron and lead and required a dilution.

For the matrix spike and matrix spike duplicate, iron and zinc recoveries were not calculated due to the concentration of analyte in the sample being >4 times the concentration of spike added.

The matrix spike recovered outside of the control limits for copper.

The matrix spike duplicate recovered outside of the control limits for arsenic, chromium, copper, and lead.

The relative percent difference between the matrix spike and the matrix spike duplicate was outside of the control limits for copper and lead.

General Chemistry:
There were no problems associated with the analysis.

METHODS SUMMARY

C3K030120

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Total Residue as Percent Solids	MCAWW 160.3 MOD	MCAWW 160.3 MOD
Trace Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 3050B

References:

MCAWW "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, March 1983 and subsequent revisions.

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C3K030120

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
F31XF	001	MH 2B-10	10/31/03	09:57
F31XH	002	MH 2A-8	10/31/03	09:45
F31XJ	003	MH 2B-5	10/31/03	10:09
F31XK	004	MH 2B-1	10/31/03	10:35
F31XL	005	MH 3A-2	10/31/03	10:55
F31XM	006	MH 3A-3	10/31/03	11:04
F31XN	007	MH 2A-2	10/31/03	12:00

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

STL-Pittsburgh

[redacted]

Chain of Custody Record

SEVERN TRENT SERVICES — Severn Trent Laboratories, Inc.

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
WHEELING PITTSBURGH STEEL			145144
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	Page 1 of 1
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	
Project Name and Location (State)	**Carrier/Waybill Number**		
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Containers & Preservatives: Unpres.	H_2SO_4	HNO_3	HCl	NaOH	ZnAc/NaOH	Analysis: Weight % OF 304 MAT'L	AR, Cr, Cu, Fe, Pb, Zn	Special Instructions/ Conditions of Receipt
MH 2B-10	10/31/03	9:57			X		X						X		
MH 2A-8		9:45											X		
MH 2B-5		10:09											X		
MH 2B-1		10:35											X		
MH 3A-2		10:55											X		
MH 3A-3		11:04											X		
MH 2A-2		12:00											X		

Possible Hazard Identification
☒ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☒ Archive For 1 Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☐ 7 Days ☐ 14 Days ☐ 21 Days ☒ Other STD

QC Requirements (Specify)

	Relinquished By	Date	Time	Received By	Date	Time
1.	Bill Palcanis	11-3-03	0930	[signature]	11-3-03	0930
2.						
3.						

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 2B-10
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 001
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 9:57AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time				Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*									
Arsenic		10.6	mg/kg	0.24	1.0	1	11/5/2003	/	11/6/03	12:32	RG
Iron		31800	mg/kg	1.7	10.1	1	11/5/2003	/	11/6/03	12:32	RG
Lead		126	mg/kg	0.27	0.30	1	11/5/2003	/	11/6/03	12:32	RG
Chromium		43.7	mg/kg	0.063	0.50	1	11/5/2003	/	11/6/03	12:32	RG
Copper		72.1	mg/kg	0.11	2.5	1	11/5/2003	/	11/6/03	12:32	RG
Zinc		5120	mg/kg	0.63	10.1	5	11/5/2003	/	11/6/03	20:13	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*									
Percent Solids		99.3	%	0.0	1.0	1	11/5/2003	/	11/6/03	08:03	CLL

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 2A-8
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 002
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 9:45AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time			Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*								
Arsenic		23.0	mg/kg	0.24	1.0	1	11/5/2003	11/6/03	12:54	RG
Chromium		89.9	mg/kg	0.064	0.51	1	11/5/2003	11/6/03	12:54	RG
Copper		381	mg/kg	0.11	2.5	1	11/5/2003	11/6/03	12:54	RG
Iron		269000	mg/kg	17.3	101	10	11/5/2003	11/6/03	20:40	RG
Lead		53.5	mg/kg	2.7	3.0	10	11/5/2003	11/6/03	20:40	RG
Zinc		3080	mg/kg	0.25	4.1	2	11/5/2003	11/6/03	20:35	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*								
Percent Solids		98.6	%	0.0	1.0	1	11/5/2003	11/6/03	08:03	CLL

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 2B-5
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 003
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 10:09AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time			Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*								
Arsenic		4.1	mg/kg	0.24	1.0	1	11/5/2003	11/6/03	12:59	RG
Iron		26700	mg/kg	1.7	10.0	1	11/5/2003	11/6/03	12:59	RG
Lead		12.2	mg/kg	0.26	0.30	1	11/5/2003	11/6/03	12:59	RG
Zinc		297	mg/kg	0.13	2.0	1	11/5/2003	11/6/03	12:59	RG
Chromium		20.3	mg/kg	0.063	0.50	1	11/5/2003	11/6/03	12:59	RG
Copper		13.2	mg/kg	0.11	2.5	1	11/5/2003	11/6/03	12:59	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*								
Percent Solids		99.6	%	0.0	1.0	1	11/5/2003	11/6/03	08:03	CLL

STL PITTSBURGH *Results per sample*

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 2B-1
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 004
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 10:35AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time			Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*								
Arsenic		5.5	mg/kg	0.24	1.0	1	11/5/2003	11/6/03	13:16	RG
Iron		18000	mg/kg	1.7	10.0	1	11/5/2003	11/6/03	13:16	RG
Lead		22.7	mg/kg	0.26	0.30	1	11/5/2003	11/6/03	13:16	RG
Zinc		668	mg/kg	0.13	2.0	1	11/5/2003	11/6/03	13:16	RG
Chromium		12.7	mg/kg	0.063	0.50	1	11/5/2003	11/6/03	13:16	RG
Copper		23.5	mg/kg	0.11	2.5	1	11/5/2003	11/6/03	13:16	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*								
Percent Solids		99.6	%	0.0	1.0	1	11/5/2003	11/6/03	08:03	CLL

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 3A-2
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 005
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 10:55AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time			Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*								
Arsenic		23.5	mg/kg	0.24	1.0	1	11/5/2003	11/6/03	13:21	RG
Chromium		101	mg/kg	0.064	0.51	1	11/5/2003	11/6/03	13:21	RG
Copper		105	mg/kg	0.11	2.5	1	11/5/2003	11/6/03	13:21	RG
Iron		92800	mg/kg	8.6	50.6	5	11/5/2003	11/6/03	20:46	RG
Lead		659	mg/kg	1.3	1.5	5	11/5/2003	11/6/03	20:46	RG
Zinc		5240	mg/kg	0.63	10.1	5	11/5/2003	11/6/03	20:46	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*								
Percent Solids		98.9	%	0.0	1.0	1	11/5/2003	11/6/03	08:03	CLL

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 3A-3
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 006
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 11:04AM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time			Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*								
Arsenic		18.5	mg/kg	0.24	1.0	1	11/5/2003	11/6/03	13:27	RG
Iron		41900	mg/kg	1.7	10.1	1	11/5/2003	11/6/03	13:27	RG
Lead		421	mg/kg	0.27	0.30	1	11/5/2003	11/6/03	13:27	RG
Chromium		61.4	mg/kg	0.064	0.51	1	11/5/2003	11/6/03	13:27	RG
Copper		88.9	mg/kg	0.11	2.5	1	11/5/2003	11/6/03	13:27	RG
Zinc		8420	mg/kg	0.64	10.1	5	11/5/2003	11/6/03	20:51	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*								
Percent Solids		98.6	%	0.0	1.0	1	11/5/2003	11/6/03	08:03	CLL

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	MH 2A-2
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120 007
Matrix:	SOLID	**Date Received:**	11/3/03
		Date Sampled:	10/31/2003 12:00PM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time			Analyst ID
SW846	6010B	*Acid Digestion of Sediments, Sludges, Soils*								
Arsenic		10.4	mg/kg	0.24	1.0	1	11/5/2003	11/6/03	13:32	RG
Iron		42900	mg/kg	1.7	10.2	1	11/5/2003	11/6/03	13:32	RG
Lead		180	mg/kg	0.27	0.31	1	11/5/2003	11/6/03	13:32	RG
Chromium		51.3	mg/kg	0.064	0.51	1	11/5/2003	11/6/03	13:32	RG
Copper		203	mg/kg	0.11	2.5	1	11/5/2003	11/6/03	13:32	RG
Zinc		6010	mg/kg	0.64	10.2	5	11/5/2003	11/6/03	20:57	RG
MCAWW	160.3 MOD	*Total Residue as Percent Solids*								
Percent Solids		98.1	%	0.0	1.0	1	11/5/2003	11/6/03	08:03	CLL

STL PITTSBURGH *Results per sample*

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

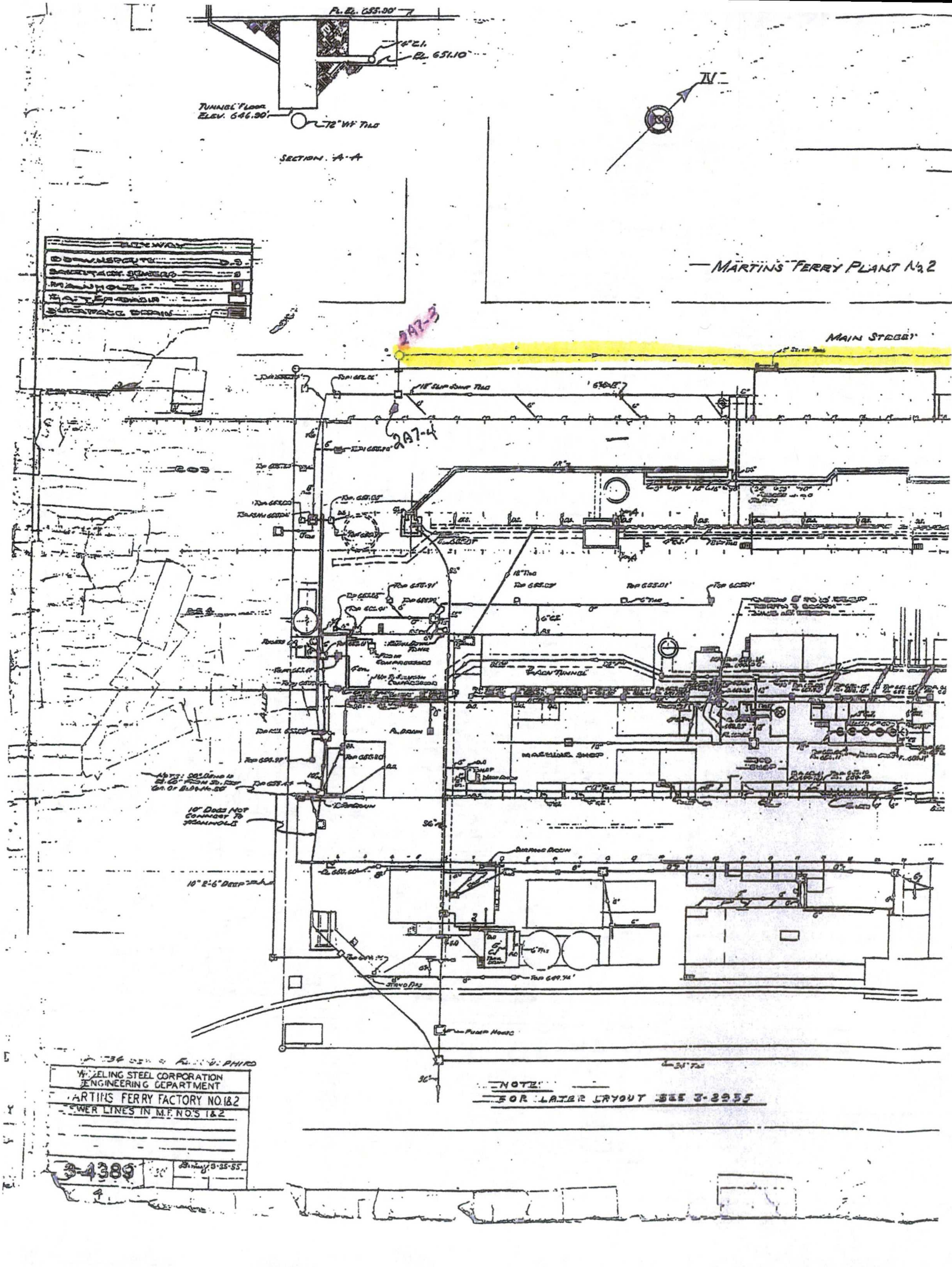
Lab Name:	STL PITTSBURGH	**Client ID:**	CHECK SAMPLE
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C3K030120
Matrix:	SOLID		

Analyses	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846 6010B	*Acid Digestion of Sediments, Sludg*							
Arsenic			1	11/6/03	RG	95	(80 - 120)	
Iron			1	11/6/03	RG	101	(80 - 120)	
Lead			1	11/6/03	RG	98	(80 - 120)	
Zinc			1	11/6/03	RG	99	(80 - 120)	
Chromium			1	11/6/03	RG	100	(80 - 120)	
Copper			1	11/6/03	RG	100	(80 - 120)	

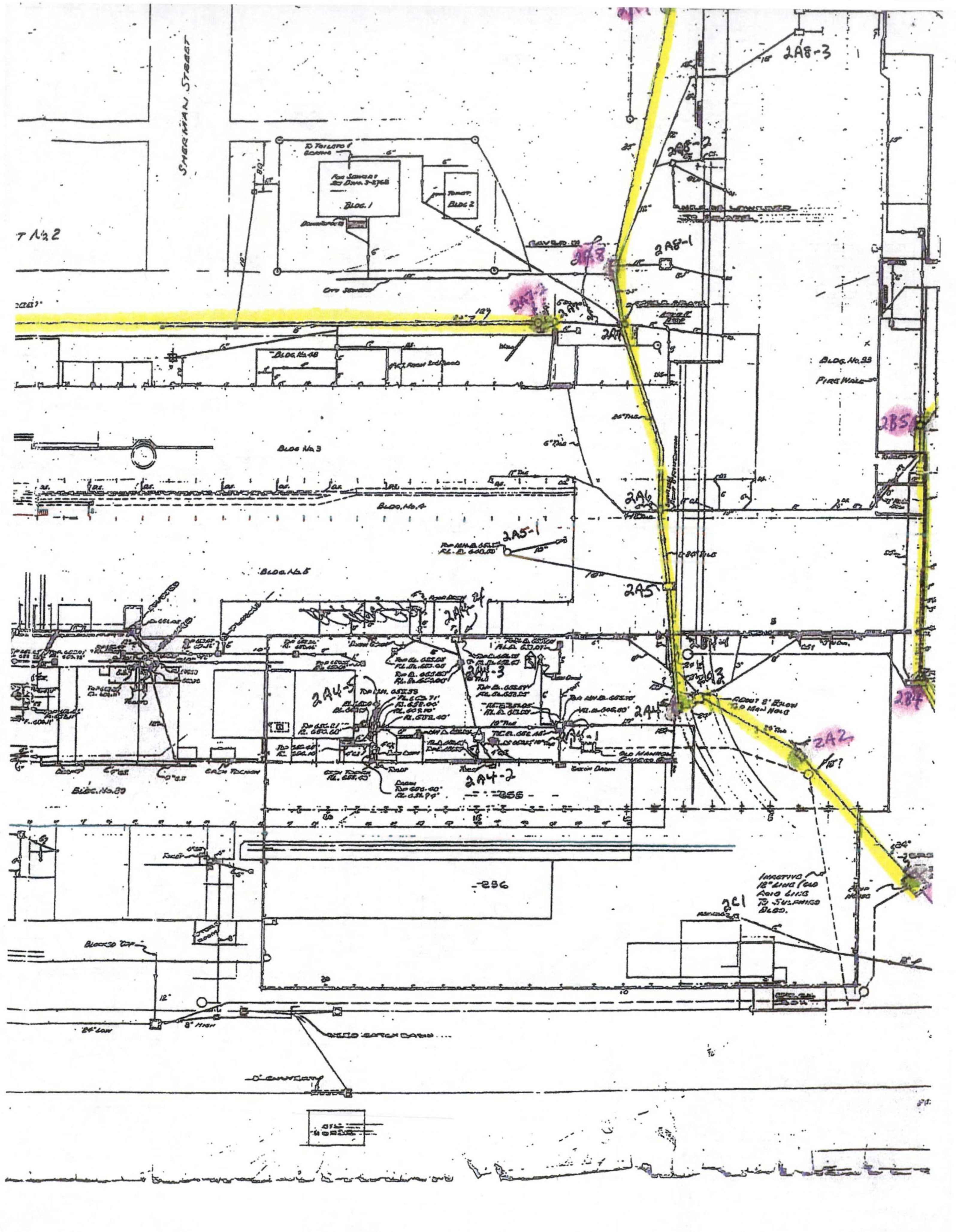
Analyses	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846 6010B	*Acid Digestion of Sediments, Sludg*								
Arsenic	ND	mg/kg	1.0	1	11/6/03	RG			
Iron	ND	mg/kg	10.0	1	11/6/03	RG			
Lead	ND	mg/kg	0.30	1	11/6/03	RG			
Zinc	ND	mg/kg	2.0	1	11/6/03	RG			
Chromium	ND	mg/kg	0.50	1	11/6/03	RG			
Copper	ND	mg/kg	2.5	1	11/6/03	RG			

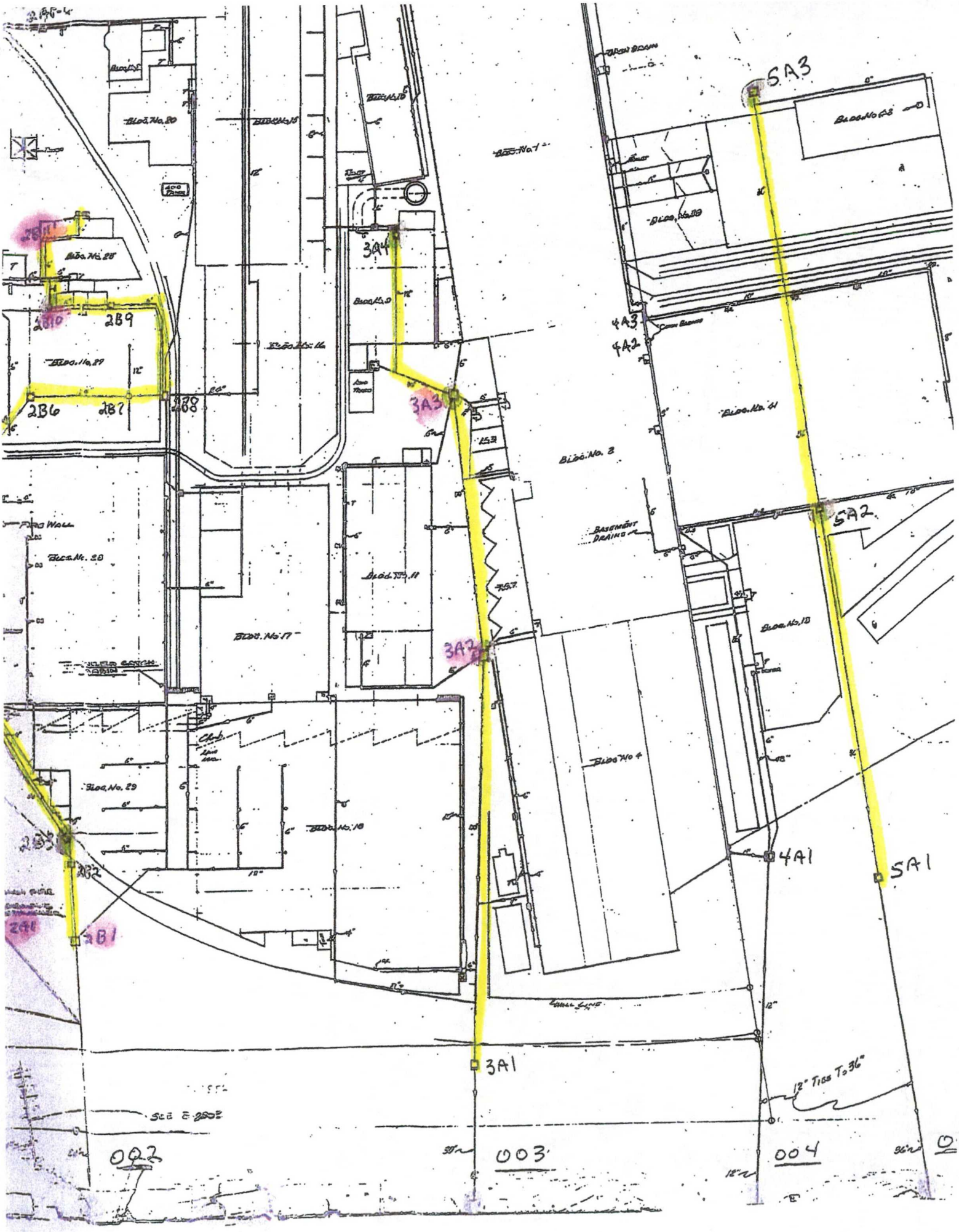
MS/MSD Report

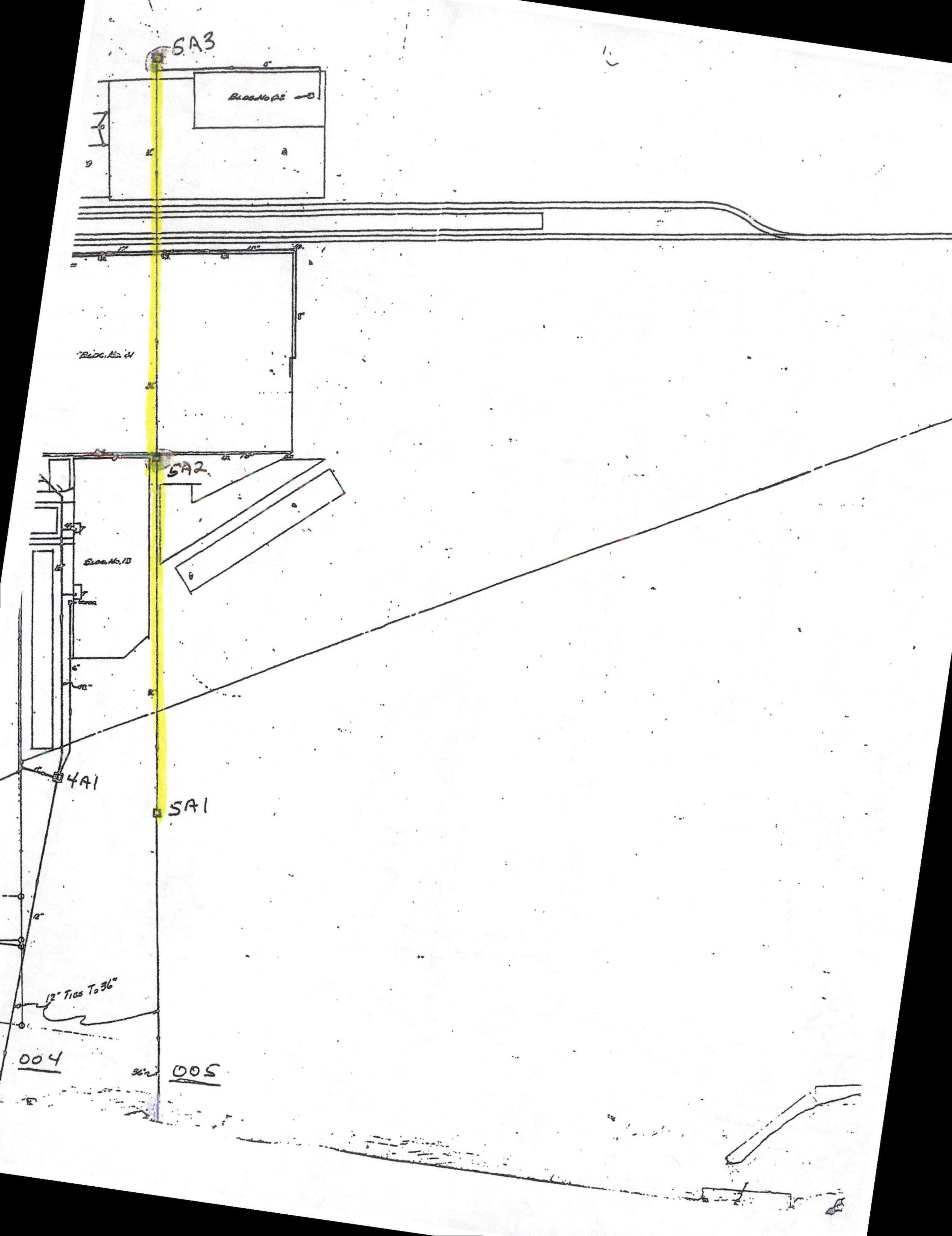
Analyses	Analysis Date	MS % Recovery		MSD % Recovery		QC Limits	RPD/ Limit
Laboratory QC ID: C3K030120001S Acid Digestion of Sediments, Sludges, Soils							
Arsenic	11/6/03	85		73	N	(75 - 125)	13/20
Chromium	11/6/03	98		44	N	(75 - 125)	19/20
Copper	11/6/03	173	N	15	N *	(75 - 125)	41/20
Iron	11/6/03		NC		NC	(75 - 125)	/20
Lead	11/6/03	113		20	N *	(75 - 125)	29/20
Zinc	11/6/03		NC		NC	(75 - 125)	/20



FL. EL. 655.00'
6" C.I.
EL. 651.10
TUNNEL FLOOR
ELEV. 646.90'
72" VIT TILE
SECTION A-A
MARTINS FERRY PLANT No 2
MAIN STREET
2A7-3
2A7-4
18" SLIP JOINT TILE
MAIN TUNNEL
MACHINE SHOP
10" DOES NOT CONNECT TO MANHOLE
SURFACE DRAIN
PUMP HOUSE
NOTE:
FOR LATER LAYOUT SEE 3-2955
ENGINEERING DEPARTMENT
3-4389


SHERMAN STREET
BLDG. 1
BLDG. 2
2A8-3
2A8-2
2A8-1
2A8
2A7-2
2A7
BLDG. No. 48
BLDG. No. 3
BLDG. No. 4
BLDG. No. 5
BLDG. No. 93
FIRE WALL
2B5
2A6
2A5-1
2A5
2A4-4
2A4-3
2A4-5
2A4-2
2A4-1
2A4
2A3
2B4-1
2A2
2B4
BLDG. No. 89
2C1
-256
-236
BLOCKED OFF
12"
8" HIGH
24" LOW


5A3
3A4
4A3
4A2
3A3
5A2
3A2
4A1
5A1
3A1
2B10
2B9
2B6
2B7
2B8
2B5
2B2
2B1
12" Tiles To 36"
002
003
004



5A3
5A2
4A1
5A1
12" Ties To 36"
004
005

FEMA MSC Viewer

Info

Scale: 15 %

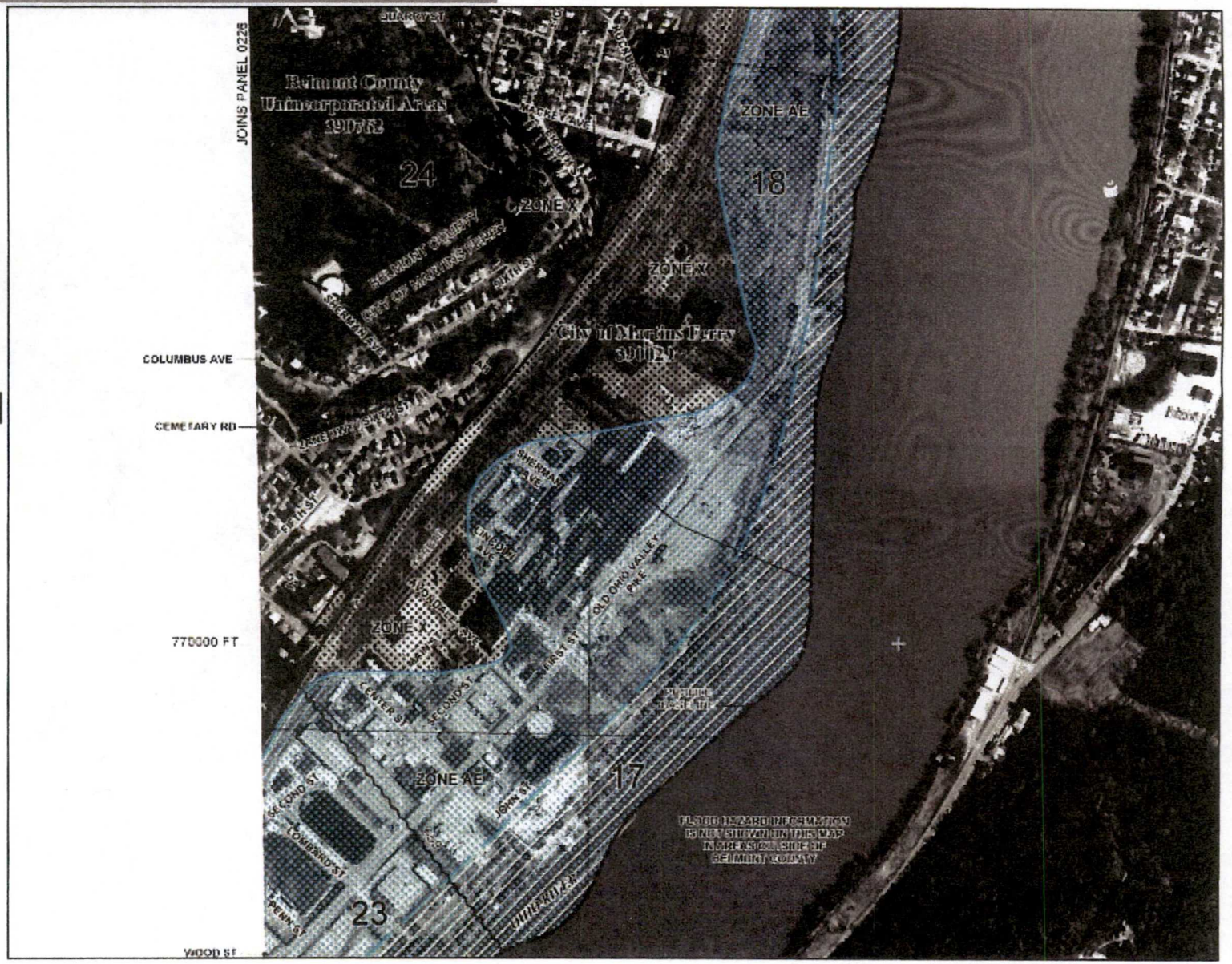
Help

Zoom Win | Pan

Zoom In | Zoom Out

1:1 Zoom In | MAX Zoom Out

Make a FIRMette



Att # 11

Att #12

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

C-14J

April 18, 2008

BY FACSIMILE AND
U.S. MAIL
Kenneth Komoroski, Esq.
Kirkpatrick & Lockhart Preston Gates Ellis, LLP
Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, Pennsylvania 15222-2312

Re: Wheeling-Pittsburgh Steel Company
Request for Access for RCRA VSIs at Steubenville and Mingo Junction, Ohio

Dear Mr. Komoroski:

This is in reply to your letter of April 9, 2008. I am writing to ensure we have an agreement that our upcoming inspections at Steubenville and Mingo Junction will be of the entire establishments, without limitation to "process lines" or other areas where regulatory hazardous wastes are managed pending shipment off-site. As stated earlier, U.S. EPA prefers consensual access as a policy matter, and we hope to avoid any future misunderstandings that would result in waste of public resources. I read your letter to allow a visual site inspection of both establishments, without any such limitation. If that is correct, please confirm by letter or electronic mail to me no later than April 23, 2008.

I also wish to clarify that, as before, U.S. EPA intends to enter at a reasonable time, and if samples are taken, will provide the facilities' representative with a receipt and will provide a copy of the analytical results upon receiving them. Further, if requested to do so, U.S. EPA will provide Wheeling-Pittsburgh a portion of each sample equal in volume or weight to the portion retained, pursuant to 42 U.S.C. § 6927(a). Finally, Ohio EPA inspectors may also participate in these inspections.

With respect to questions posed during the inspections that began March 31, 2008, but which Wheeling-Pittsburgh Steel Corporation did not answer at that time, I understand that an employee with knowledge of the Yorkville plant operations had been sent to confer with the inspectors on April 4th (the final day of those inspections) but he was subsequently instructed not to a participate and that you would appear later in the day instead. Respectfully, our inspectors

had hoped to confer with a plant employee with first-hand knowledge of its operations. In any event, U.S. EPA may commit these questions to writing and forward them to Wheeling-Pittsburgh Steel as a follow-up RCRA section 3007 written information request, and we would request additional documents at that time.

Sincerely yours,

Thomas M. Williams
Associate Regional Counsel

cc: Michael Mikulka (LCD-9J)
Kris Vezner (C-14J)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 0 4 2008

C-14J

BY FACSIMILE AND
U.S. MAIL
Kenneth Komoroski, Esq.
Kirkpatrick & Lockhart Preston Gates Ellis, LLP
Henry W. Oliver Building
535 Smithfield Street
Pittsburgh, Pennsylvania 15222-2312

Re: Wheeling-Pittsburgh Steel Company
Request for Access for RCRA VSI at Yorkville and Martins Ferry, Ohio Facilities

Dear Mr. Komoroski:

I write in reply to your letter of January 8, 2008. As I have already told you, EPA wishes to perform a Visual Site Inspection (VSI) at the Yorkville and Martins Ferry facilities in the exercise of its authority under section 3007(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6907(a). Depending on the results of that and the Preliminary Assessment, EPA may elect to enforce the provisions of RCRA, including corrective action under RCRA section 3008(h), investigation under section 3013, cleanup under section 7003, and regulatory enforcement under section 3008(a).[1] Again, as I have told you in the past, EPA can use the results of a PA/VSI for any of these purposes.

While Ohio has an authorized RCRA program, EPA retains the authority to enforce it. Additionally, as I presume you are aware, certain RCRA provisions, such as section 3013, are not delegated to the states. Accordingly, EPA retains the authority to enforce RCRA against facilities in Ohio.

In view of that, EPA will not agree, as a precondition to obtaining access under the authority Congress has given it, to waive any of its other statutory authorities or provide a covenant not to sue. Your correspondence suggests that you believe Wheeling-Pittsburgh has a defense to the assertion of RCRA corrective action authority, but it remains that EPA is at this point conducting a preliminary assessment, and EPA will not take a position on the applicability of a particular statutory provision without first completing its own examination of relevant facts. In any event,

[1] EPA can also use the PA/VSI to support the exercise of its authority under CERCLA, 42 U.S.C. § 9601 *et* seq.. While EPA is presently exercising its inspection authority under RCRA, we expressly reserve CERCLA authority.

quite apart from the question of the scope of corrective action authority, your letter omits any explanation of why EPA cannot engage in regulatory enforcement or the exercise of authority under section 3013 at the two facilities.[2]

To the extent Wheeling-Pittsburgh would point to its proposed participation in the Ohio Voluntary Action Program (VAP) as a basis for excluding EPA from its facilities, such reliance is misplaced. First, as you must know from reviewing the Memorandum of Agreement, it creates no right or benefit, substantive or procedural, enforceable against EPA or Ohio EPA, and does not relieve any facility from RCRA compliance. In any event, EPA understands that Ohio EPA has now concluded that Wheeling-Pittsburgh is ineligible for participation in the VAP, and that a letter stating as much has been sent to you.

For the record, I disagree with your interpretation of the U.S. Department of Justice's June 26, 2007, letter. Nowhere does it say that WPSC "should proceed with the appropriate agency for each individual issue or matter." Instead, it says that in view of significant disagreement, particularly with regard to RCRA, "the Agencies have elected to terminate these global [settlement] negotiations and to address the matters they have raised through more traditional means." Barring access to our inspectors and then, without notice to EPA, proposing to enter a voluntary, "Brownfields"-type cleanup program, does not constitute a "traditional means" of resolving long-standing concerns over RCRA compliance, such as those regarding the lay-down yard at Martins Ferry and the apparent release of spent pickle liquor at Yorkville.

We do appreciate, though, that by seeking participation in the VAP, you recognize that there are areas at Wheeling-Pittsburgh's Ohio facilities that require investigation, characterization and, possibly, clean-up. With that in mind, I suggest that the more prudent course of action is for Wheeling-Pittsburgh Steel Corporation to cooperate with EPA and allow its contractors to complete the Visual Site Inspections at Martins Ferry and Yorkville as soon as possible. With those tasks accomplished, we may then discuss any sampling Wheeling-Pittsburgh has undertaken and the closure plans and other materials that were prepared for Ohio EPA. In the meantime, EPA's request for access remains pending; please let me know of your client's intentions to comply as soon as possible.

Sincerely yours,

Thomas M. Williams
Associate Regional Counsel

---

[2] Your suggestion that section 7003 cannot apply because no "imminent hazard has been alleged" overlooks the fact that EPA may need to investigate, as by exercising its section 3007(a) inspection authority, before it makes such an "allegation."

WPS MARTINS FERRY PLANT
SPILL HISTORY

Date	Incident	Comments
7/24/00	MPW vac truck was unloading into the WWTP holding tank and spilled approx. 1000 gallons of soap/oil water from 60" entry cleanup. Had MPW clean up entire area and contaminated soils.	No RQ
1/9/01	Forklift dropped 320 gal tote of Oakite F2 chromic acid product on roadway to oil house. Entire contents spilled onto pavement, and 5 gallons reached soil. Vac truck cleaned up area.	No RQ
4/18/01	OEPA arrived at plant to investigate complaint about baghouse dust on road.	No release
11/14/01	Quaker Chemical tote 1743, LC00157 at SE corner of oil house was dripping liquid onto asphalt	No release
1/14/03	Mercury spill (est. 3 lbs) in Storeroom, believed related to Dec 2002 fire. No release to the environment. Cleaned up by Weavertown on 1/16.	No release
3/21/05	Spill of Tectyl SG liquid to public road between WWTP and main plant. No release to environment. Cleaned up with floor dry for disposal.	No release
9/19/07	Diesel fuel was spilled to the dust suppressed soil near the truck scale when a non-WPSC truck drove off the scale and punctured his fuel tank on a support. Est. 35 gallons was spilled, and cleaned up by plant forces. OEPA was notified, since the Ohio RQ of 25 gallons was exceeded. Belmont county EMA was on-site to observe the incident.	RQ Release

Att # 13

Att #14

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TestAmerica Laboratories, Inc.

ANALYTICAL REPORT

PROJECT NO. MF-PJS-08003

Wheeling Pittsburgh Steel

Lot #: C8F160184

Pat Smith

Wheeling Pittsburgh Steel

TESTAMERICA LABORATORIES, INC.

Christina M. Kovitch
Project Manager

June 24, 2008

301 Alpha Drive Pittsburgh, PA 15238 tel 412.963.7058 fax 412.963.2468 www.testamericainc.com

NELAC REPORTING:

At the time of analysis the laboratory was in compliance with the current NELAC standards and held accreditation for all analyses performed unless noted by a qualifier. The labs accreditation numbers are listed below. The format and contents of the report meets all applicable NELAC standards except as noted in the narrative and shall not be reproduced except in full, without the written approval of the laboratory. The table below presents a summary of the certifications held by TestAmerica Pittsburgh. Our primary accreditation authority for the Non-potable water and Solid & Hazardous waste programs is Pennsylvania DEP. A more detailed parameter list is available upon request. Please ask your project manager for this information when required.

Certifying State/Program	Certificate #	Program Types	TestAmerica
NFESC	NA	NAVY	X
US Dept of Agriculture	(#P330-07-00101)	Foreign Soil Import Permit	X
Arkansas	(#03-022-1)	WW	X
		HW	X
California – NELAC	04224CA	WW	X
		HW	X
Connecticut	(#PH-0688)	WW	X
		HW	X
Florida – NELAC	(#E87660)	WW	X
		HW	X
Illinois – NELAC	(#200005)	WW	X
		HW	X
Kansas – NELAC	(#E-10350)	WW	X
		HW	X
Louisiana – NELAC	(#93200)	WW	X
		HW	X
New Hampshire – NELAC	(#203002)	WW	X
		–	–
New Jersey – NELAC	(PA-005)	WW	X
		HW	X
New York – NELAC	(#11182)	WW	X
		HW	X
North Carolina	(#434)	WW	X
		HW	X
Pennsylvania - NELAC	(#02-00416)	WW	X
		HW	X
South Carolina	(#89014001)	WW	X
		HW	X
Utah – NELAC	(STLP)	WW	X
		HW	X
West Virginia	(#142)	WW	X
		HW	X
Wisconsin	998027800	WW	X
		HW	X

The codes utilized for program types are described below:

HW Hazardous Waste certification
WW Non-potable Water and/or Wastewater certification
X Laboratory has some form of certification under the specific program. Many states certify laboratories for specific parameters or tests within a category. The information in the table indicates the lab is certified in a general category of testing. Please contact the laboratory if parameter specific certification information is required.

Updated: 12/28/07 C:\Documents and Settings\derubeisn\My Documents\NELAC NARRATIVE Pttsburgh.doc

CASE NARRATIVE
Wheeling Pittsburgh Steel

LOT # C8F160184

Sample Receiving:
TestAmerica's Pittsburgh laboratory received one sample on June 16, 2008. The coolers were received within the proper temperature range.

If project specific QC was not required for samples contained in this report, when batch QC was completed on these samples, anomalous results will be discussed below.

Metals:
Due to matrix, the sample was digested at a dilution for the 6020 analysis.

METHODS SUMMARY

C8F160184

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
ICP-MS (6020)	SW846 6020	
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A	SW846 1311/7470

References:

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C8F160184

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
KP2D5	001	MF-PJS-08003 RED MAT'L NEAR COAL PILE	06/11/08	16:00

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

C8F160184

Chain of Custody Record

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TAL-4142 (0907)

Client	Project Manager	Date	Chain of Custody Number
WPS	PAT SMITH	6/16/08	364665
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page 1 of 1**
COMMERCIAL AVENUE			
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	**Analysis (Attach list if more space is needed)**
MINA JUNCTION / OH / 43938		C. KOVITCH	TCLP 8-Metals 6020
Project Name and Location (State)	**Carrier/Waybill Number**		
MARTINS FERRY			
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Waste	Containers & Preservatives: Unpres.	H_2SO_4	HNO_3	HCl	NaOH	$ZnAc/NaOH$	TCLP 8-Metals 6020	Special Instructions/ Conditions of Receipt
MF-PJS-080608 RED MATL NEAR COAL PILE	6/11/08	4:00 PM					1	✓							

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☑ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For _____ Months
(A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____

QC Requirements (Specify)

	Relinquished By	Date	Time	Received By	Date	Time
1.	Pat Smith	6/16/08	10:34		6-16-08	1034
2.		6-16-08	1430		6-16-08	1430
3.		Date	Time		Date	Time

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

9

9 OF

Wheeling Pittsburgh Steel

Lab Name:	TESTAMERICA PITTSBURGH	**Client ID:**	MF-PJS-08003 RED MAT'L NEAR COAL PILE
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C8F160184 001
Matrix:	SOLID	**Date Received:**	6/16/2008
		Date Sampled:	6/11/2008 4:00PM

Parameter		Result	Units	MDL	Reporting Limit	Dilution Factor	Prep/Analysis Date/Time	Analyst ID
SW846	7470A	*TCLP Leachate / Mercury Preparation*					TestAmerica Pittsburgh	
Mercury		ND	mg/L	0.000055	0.00020	1	6/20/2008 / 6/20/2008 09:16	BAH
SW846	6020	*TCLP(1311) -> METALS, TOTAL*					TestAmerica Pittsburgh	
Arsenic		ND	mg/L	0.0014	0.010	10	6/20/2008 / 6/22/2008 00:56	BR
Lead		ND	mg/L	0.00020	0.010	10	6/20/2008 / 6/22/2008 00:56	BR
Barium		ND	mg/L	0.00076	0.10	10	6/20/2008 / 6/22/2008 00:56	BR
Selenium		ND	mg/L	0.0021	0.050	10	6/20/2008 / 6/22/2008 00:56	BR
Silver		ND	mg/L	0.00077	0.010	10	6/20/2008 / 6/22/2008 00:56	BR
Chromium		0.11	mg/L	0.0011	0.020	10	6/20/2008 / 6/22/2008 00:56	BR
Cadmium		ND	mg/L	0.0011	0.010	10	6/20/2008 / 6/22/2008 00:56	BR

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B". Blank values below the RL are not narrated.

Wheeling Pittsburgh Steel

Lab Name:	TESTAMERICA PITTSBURGH	**Client ID:**	CHECK SAMPLE
Client Name:	Wheeling Pittsburgh Steel	**Lab ID:**	C8F160184
Matrix:	SOLID		

Analyses	LCS	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	7470A	*TCLP Leachate / Mercury Preparation*		TestAmerica Pittsburgh					
Mercury				1	6/20/2008	BAH	106	(80 - 120)	
SW846	6020	*TCLP(1311) -> METALS, TOTAL*		TestAmerica Pittsburgh					
Arsenic				5	6/22/2008	BR	97	(80 - 120)	
Lead				5	6/22/2008	BR	106	(80 - 120)	
Barium				5	6/22/2008	BR	100	(80 - 120)	
Selenium				5	6/22/2008	BR	111	(80 - 120)	
Silver				5	6/22/2008	BR	102	(80 - 120)	
Chromium				5	6/22/2008	BR	94	(80 - 120)	
Cadmium				5	6/22/2008	BR	103	(80 - 120)	

Analyses	MB	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846	7470A	*TCLP Leachate / Mercury Preparation*			TestAmerica Pittsburgh					
Mercury		ND	mg/L	0.00020	1	6/20/2008	BAH			
Mercury		ND	mg/L	0.00020	1	6/20/2008	BAH			
SW846	6020	*TCLP(1311) -> METALS, TOTAL*			TestAmerica Pittsburgh					
Arsenic		ND	mg/L	0.0050	5	6/22/2008	BR			
Lead		ND	mg/L	0.0050	5	6/22/2008	BR			
Barium		ND	mg/L	0.050	5	6/22/2008	BR			
Selenium		ND	mg/L	0.025	5	6/22/2008	BR			
Silver		ND	mg/L	0.0050	5	6/22/2008	BR			
Chromium		ND	mg/L	0.010	5	6/22/2008	BR			
Cadmium		ND	mg/L	0.0050	5	6/22/2008	BR			
Arsenic		ND	mg/L	0.0010	1	6/22/2008	BR			
Lead		ND	mg/L	0.0010	1	6/22/2008	BR			
Barium		ND	mg/L	0.010	1	6/22/2008	BR			
Selenium		ND	mg/L	0.0050	1	6/22/2008	BR			
Silver		ND	mg/L	0.0010	1	6/22/2008	BR			
Chromium		ND	mg/L	0.0020	1	6/22/2008	BR			
Cadmium		ND	mg/L	0.0010	1	6/22/2008	BR			

MS/MSD Report

Analyses	Analysis Date	MS % Recovery	MSD % Recovery	QC Limits	RPD/ Limit
Laboratory QC ID: C8F160184001S TCLP Leachate / Mercury Preparation					
Mercury	6/20/2008	105	105	(75 - 125)	0.19/20
Laboratory QC ID: C8F160184001S TCLP(1311) -> METALS, TOTAL					
Arsenic	6/22/2008	101	100	(75 - 125)	1.2/20
Barium	6/22/2008	102	101	(75 - 125)	1.2/20
Cadmium	6/22/2008	105	107	(75 - 125)	2.5/20
Chromium	6/22/2008	111	111	(75 - 125)	0.14/20
Lead	6/22/2008	102	102	(75 - 125)	0.18/20
Selenium	6/22/2008	96	81	(75 - 125)	14/20
Silver	6/22/2008	104	103	(75 - 125)	1.3/20

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: OHD010448831
2. Page 1 of: 1
3. Emergency Response Phone: 800-688-4005
4. Manifest Tracking Number: 000701486 JJK

5. Generator's Name and Mailing Address: Wheeling Pittsburgh Steel Corporation, Commercial Avenue, Mingo Junction, OH 43938
Generator's Site Address (if different than mailing address): 1001 Main Street, Martins Ferry, OH 43935

ATT #15

Generator's Phone: 740-283-5542

6. Transporter 1 Company Name: EAP Industries, Inc. — U.S. EPA ID Number: PAR000048341

7. Transporter 2 Company Name: — U.S. EPA ID Number:

8. Designated Facility Name and Site Address: MAX Environmental Technologies, Inc., 233 MAX Lane, Yukon, PA 15698 — U.S. EPA ID Number: PAD004835146
Facility's Phone: 724-722-3500

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes			
X	1. RQ, Hazardous Waste, Solid, n.o.s., NA3077, 9, PGIII	001	CM	4,800	P	D007			
	2.								
	3.								
	4.								

14. Special Handling Instructions and Additional Information: GIS#5482

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: David P. Zeakes — Signature: [signature] — Month 05 Day 27 Year 08

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: ____
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Andrew Diamond — Signature: [signature] — Month 05 Day 27 Year 08
Transporter 2 Printed/Typed Name: — Signature: — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number: Actual Weight 4800 P

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H111 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: [illegible] — Signature: [signature] — Month 05 Day 27 Year 08

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. **DESIGNATED FACILITY TO GENERATOR**

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

SEVERN TRENT LABORATORIES, INC. 2.5.5.5.4 ECM ECSF

PRELIMINARY DATA SUMMARY Att #16

The results shown below may still require additional laboratory review and are subject to change. Actions taken based on these results are the responsibility of the data user.

Wheeling Pittsburgh Steel — PAGE 1

Lot #: C2L180273 — MARTINS FERRY — Date Reported: 12/27/02

Project Number: WHEELING PITT

PARAMETER		RESULT	REPORTING LIMIT	UNITS	ANALYTICAL METHOD	
Client Sample ID: MF-PJS-02506 CHEM-TREAT RUBBER ROLL GRINDINGS						
Sample #: 001 Date Sampled: 12/06/02 13:00 Date Received: 12/18/02 Matrix: SOLID						
Inductively Coupled Plasma (ICP) Metals TCLP						Reviewed
Silver	TCLP	ND	0.50	mg/L	SW846 6010B	
Arsenic	TCLP	ND	0.50	mg/L	SW846 6010B	
Barium	TCLP	ND	10.0	mg/L	SW846 6010B	
Cadmium	TCLP	ND	0.10	mg/L	SW846 6010B	
Chromium	TCLP	ND	0.50	mg/L	SW846 6010B	
Lead	TCLP	4.3	0.50	mg/L	SW846 6010B	
Selenium	TCLP	ND	0.25	mg/L	SW846 6010B	
Mercury in Liquid Waste (Manual Cold-Vapor) TCLP						Reviewed
Mercury	TCLP	ND	0.00020	mg/L	SW846 7470A	

SEVERN TRENT STL

ANALYTICAL REPORT

PROJECT NO. WHEELING PITT

MARTINS FERRY

Lot #: C2L180273

Pat Smith

Wheeling Pittsburgh Steel

SEVERN TRENT LABORATORIES, INC.

Christina M. Kovitch
Project Manager

December 27, 2002

Severn Trent Laboratories, Inc.
STL Pittsburgh • 450 William Pitt Way, Pittsburgh, PA 15238
Tel 412 820 8380 Fax 412 820 2080 • www.stl-inc.com

A part of Severn Trent plc

CASE NARRATIVE
WHEELING PITTSBURGH STEEL
Martins Ferry

LOT # C2L180273

Sample Receiving:
STL Pittsburgh received one sample on Decemher 18, 2002. The cooler was received within the proper temperature range.

Metals:
The matrix spike duplicate recovered outside of the control limits for barium and lead.

The relative percent difference between the matrix spike and the matrix spike duplicate was outside of the control limits for barium.

METHODS SUMMARY

C2L180273

PARAMETER	ANALYTICAL METHOD	PREPARATION METHOD
Inductively Coupled Plasma (ICP) Metals	SW846 6010B	SW846 1311/3010
Mercury in Liquid Waste (Manual Cold-Vapor)	SW846 7470A	SW846 1311/7470

References:

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 and its updates.

SAMPLE SUMMARY

C2L180273

WO #	SAMPLE#	CLIENT SAMPLE ID	SAMPLED DATE	SAMP TIME
FE373	001	MF-PJS-02506 CHEM-TREAT RUBBER ROLL GRINDINGS	12/06/02	13:00

NOTE(S):

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

Chain of Custody Record

SEVERN TRENT **STL**

Severn Trent Laboratories, Inc.

STL Pittsburgh
450 William Pitt Way, Bldg. 6
Pittsburgh, PA 15238

STL-4124 (0901)

Client	Project Manager	Date	Chain of Custody Number
WPSC-	C. KOVITCH	12/18/02	180388
Address	**Telephone Number (Area Code)/Fax Number**	**Lab Number**	**Page** 1 of 1
COMMERCIAL AVENUE			
City / **State** / **Zip Code**	**Site Contact**	**Lab Contact**	
MINGO JUNCTION / OH / 43938	PAT SMITH		
Project Name and Location (State)	**Carrier/Waybill Number**		
Contract/Purchase Order/Quote No.			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Unpres.	Containers & Preservatives: H2SO4	HNO3	HCl	NaOH	ZnAc/NaOH	Analysis: TCLP Metals	Total Zn, Pb	pH	Special Instructions/ Conditions of Receipt
MF-PJS-02506 CHEM-TREAT RUBBER ROLL GRINDINGS	12/6/02	1:00 PM					✓						✓			
MF-PJS-02507 MFP001 4 PM OVERFLOW	12/17/02	4:00 PM		✓										✓	✓	
MF-PJS-02508 MFP001 7 PM OVERFLOW	12/17/02	7:00 PM		✓										✓	✓	
MF-PJS-02509 MFP001 10 PM OVERFLOW	12/17/02	10:00 PM		✓										✓	✓	

Possible Hazard Identification
☑ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☑ Disposal By Lab ☐ Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☑ 7 Days ☐ 14 Days ☐ 21 Days ☐ Other _____

QC Requirements (Specify)

	Relinquished By	Date	Time	Received By	Date	Time
1.		12/18/02	11:15 AM		12-18-02	1115
2.		12-18-02	1515	Patrick R Faust	12-18-02	1515
3.						

Comments

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

MARTINS FERRY

Lab Name:	STL PITTSBURGH	**Client ID:**	MF-PJS-02506 CHEM-TREAT RUBBER ROLL GRINDINGS
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C2L180273 001
Matrix:	SOLID	**Date Received:**	12/18/02
		Date Sampled:	12/6/2002 1:00PM

Analyses		Result	Units	MDL	Reporting Limit	Dil Factor	Analysis Date/Time		Analyst ID
SW846	6010B	*TCLP Leachate / Acid Digestion*							
Arsenic		ND	mg/L	0.020	0.50	1	12/27/02	08:55	RG
Lead		4.3	mg/L	0.012	0.50	1	12/27/02	08:55	RG
Barium		ND	mg/L	0.00062	10.0	1	12/27/02	08:55	RG
Selenium		ND	mg/L	0.023	0.25	1	12/27/02	08:55	RG
Silver		ND	mg/L	0.0016	0.50	1	12/27/02	08:55	RG
Chromium		ND	mg/L	0.0024	0.50	1	12/27/02	08:55	RG
Cadmium		ND	mg/L	0.0022	0.10	1	12/27/02	08:56	RG
SW846	7470A	*TCLP Leachate / Mercury Preparation*							
Mercury		ND	mg/L	0.000093	0.00020	1	12/23/02	17:12	JS

Notes: ND - Not Detected at the Reporting Limit

B - Compound detected, but below the Reporting Limit (the value given is an estimate).

J - Compound was detected in the Method Blank All associated samples are flagged with a "B" Blank values below the RL are not narrated.

Lab Name:	STL PITTSBURGH	**Client ID:**	CHECK SAMPLE
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C2L180273
Matrix:	SOLID		

Analyses	Result	Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846 6010B	*TCLP Leachate / Acid Digestion*							
Arsenic			1	12/27/02	RG	111	(80 - 120)	
Lead			1	12/27/02	RG	95	(80 - 120)	
Barium			1	12/27/02	RG	98	(80 - 120)	
Selenium			1	12/27/02	RG	105	(80 - 120)	
Silver			1	12/27/02	RG	102	(80 - 120)	
Chromium			1	12/27/02	RG	99	(80 - 120)	
Cadmium			1	12/27/02	RG	96	(80 - 120)	
SW846 7470A	*TCLP Leachate / Mercury Prepara*							
Mercury			1	12/23/02	JS	111	(80 - 120)	

Lab Name:	STL PITTSBURGH	**Client ID:**	BLK - C2L230000144B
Client Name:	WHEELING PITTSBURGH STEEL	**Lab ID:**	C2L180273
Matrix:	SOLID		

Analyses	Result		Reporting Limit	Dilution Factor	Analysis Date	Analyst ID	Percent Recovery	QC Limits	RPD/ Limit
SW846 6010B	*TCLP Leachate / Acid Digestion*								
Arsenic	ND	mg/L	0.50	1	12/27/02	RG			
Lead	ND	mg/L	0.50	1	12/27/02	RG			
Barium	ND	mg/L	10.0	1	12/27/02	RG			
Selenium	ND	mg/L	0.25	1	12/27/02	RG			
Silver	ND	mg/L	0.50	1	12/27/02	RG			
Chromium	ND	mg/L	0.50	1	12/27/02	RG			
Cadmium	ND	mg/L	0.10	1	12/27/02	RG			
Arsenic	ND	mg/L	0.50	1	12/27/02	RG			
Lead	ND	mg/L	0.50	1	12/27/02	RG			
Barium	ND	mg/L	10.0	1	12/27/02	RG			
Selenium	ND	mg/L	0.25	1	12/27/02	RG			
Silver	ND	mg/L	0.50	1	12/27/02	RG			
Chromium	ND	mg/L	0.50	1	12/27/02	RG			
Cadmium	ND	mg/L	0.10	1	12/27/02	RG			
SW846 7470A	*TCLP Leachate / Mercury Prepara*								
Mercury	ND	mg/L	0.00020	1	12/23/02	JS			
Mercury	ND	mg/L	0.00020	1	12/23/02	JS			

MS/MSD Report

Analyses	Analysis Date	MS % Recovery	MSD % Recovery		QC Limits	RPD/ Limit
Laboratory QC ID: C2L180273001S TCLP Leachate / Acid Digestion						
Arsenic	12/27/02	94	112		(75 - 125)	16/20
Barium	12/27/02	94	69	N *	(75 - 125)	30/20
Cadmium	12/27/02	91	108		(75 - 125)	17/20
Chromium	12/27/02	90	106		(75 - 125)	17/20
Lead	12/27/02	82	74	N	(75 - 125)	5.1/20
Selenium	12/27/02	95	113		(75 - 125)	17/20
Silver	12/27/02	86	91		(75 - 125)	5.5/20
Laboratory QC ID: C2L180273001S TCLP Leachate / Mercury Preparation						
Mercury	12/23/02	103	101		(75 - 125)	2.0/20

Copy from → 1.8.6.5.1

Ohio Department of Commerce

Division of State Fire Marshal
Bureau of Underground Storage Tank Regulations
8895 E Main St. • P.O. Box 687
Reynoldsburg, OH 43068-9009
(614) 752-7938 FAX (614) 752-7942
www.com.ohio.gov

Ted Strickland
Governor

Kimberly A. Zurz
Director

Att #17

May 20, 2008

BUD SMITH
WHEELING PITTSBURGH STEEL CORP.
1134 MARKET ST
WHEELING, WV 26003

SITE: WHEELING PITTSBURGH STEEL CORP.
(1990 UST REMOVAL)
1001 MAIN ST
MARTINS FERRY OH
BELMONT COUNTY
RELEASE #07000179-N00001

RE: NO FURTHER ACTION STATUS REGARDING CORRECTIVE ACTION REQUIREMENTS

Dear Mr. Smith:

The Bureau of Underground Storage Tank Regulations (BUSTR) has reviewed all information submitted for this release. Based on this information, BUSTR requires no further action (NFA) involving corrective action under Ohio Administrative Code (OAC) 1301:7-9-13, effective March 2005.

Thank you for your cooperation. The submitted information for this release is available from BUSTR as a public record. If you have any questions, please contact our office at (614) 752-7938.

Sincerely,

Kelly J. Gill
Corrective Action Supervisor

xc: Site File
David Olson – Civil & Environmental Consultants, Inc.

REPORT CHANGES TO ENGINEERING DEPARTMENT

LOWER GAUGE AT PIKE ISLAND DAM, ZERO ELEVATION OF LOWER GAUGE - 611.000'
PLANT LOCATED 3.0 MILES SOUTH OF ZERO GAUGE
PIKE ISLAND DAM LOWER POOL ELEV. (HANNIBAL POOL) - 623.000'
PIKE ISLAND DAM UPPER POOL ELEV. - 644.000'

OUTFALL 001 APPROX AREA = 11.36 ACRES
OUTFALL 002 APPROX AREA = 7.63 ACRES

REFERENCES	NO.	BY	DATE	DESCRIPTION
3-04389				
3-06350 (FOR KEY)	A	BLOOR	020904	ISSUE FOR APPROVAL
3-10612	B	AWM	081704	FINAL
3-10615				

"THIS DRAWING AND ALL DESIGN AND DETAILS SHOWN ON IT ARE THE PROPERTY OF WHEELING-PITTSBURGH STEEL CORPORATION AND ARE CONFIDENTIAL. THE DRAWING IS NOT TO BE COPIED WITHOUT WRITTEN PERMISSION OF WHEELING-PITTSBURGH STEEL CORPORATION AND IS RETURNABLE ON DEMAND. ALL PATENT AND DESIGN RIGHTS ARE RESERVED."

TOLERANCES UNLESS OTHERWISE SPECIFIED	
FRACTIONS ± 1/64"	FABRICATING± 1/16"
DECIMALS ± .005	ALL THREADS - CLASS 2 FIT
ANGLES ± 1/2°	

VENDOR	WPSC
VENDOR DWG. No.	3-50060
SHOP ORDER No.	STORM
DISCIPLINE	PIPING
DWG. TYPE	KEY - PLAN

TITLE	MARTINS FERRY - STORM WATER PROVENTION PLAN (BY OUTFALLS)
DRAWN BY	B. BLOOR
CHECKED BY	W. PYSH
APPROVED BY	O. WAMSLEY
EQUIP. LOC.	GENERAL\OTHER
PLANT	MARTINS FERRY
DEPARTMENT	UTILITIES
EQUIPMENT	SEWER\SEWAGE SYSTEMS
COMPONENT	SEWERS
SUB COMP.	PIPE
SCALE	1"=50'-0"
DATE	010801
DWG. NO.	3-50060

Wheeling Pittsburgh STEEL CORPORATION

Aug 17, 2004 - 16:23:35 AWM M:\SPCC\DWG\MARTINS FERRY\ 3-50060.dwg

ATTACHMENT 19

CITY STORM SEWER

CITY STORM SEWER

OUTDOOR FORKLIFT MAINTENANCE AREA

Zn AMMONIA CHLORIDE TANK & LOADING AREA

BAGHOUSE DUST ROLLOFF BOXES

PLUGGED

TRASH DUMPSTER

CHEM TREAT WASTE ROLLOFF BOX

CLARK STREET

TRASH DUMPSTER

BRINE TANK

HCl TANKS & LOADING AREA

TRASH DUMPSTER

ZINC BRICKS

ZINC POTS

PLUGGED

LIME SILO

WASTEWATER TREATMENT PLANT

ACID/ALKALINE WASTE STORAGE

TRASH DUMPSTER

OUTFALL 001
632.753 INVERT ELEV.
36" CLAY TILE W\36"X36" OPENING
MILE 88.10 (FROM PITTSBURGH HEADWATERS)

OUTFALL 002
630.338 INVERT ELEV.
24" CLAY TILE
MILE 87.83 (FROM PITTSBURGH HEADWATERS)

OUTFALL 003
631.545 INVERT ELEV.
(PLUGGED SEWER, NO LONGER IN USE)
36" CULVERT
MILE 87.79 (FROM PITTSBURGH HEADWATERS)

OUTFALL 005
630.443 INVERT ELEV.
(ALL W-P LATERALS TO OUTFALL 005 SEWER PLUGGED 12/7/05)
36" CLAY TILE
MILE 87.89 (FROM PITTSBURGH HEADWATERS)
(PLUGGED SEWER, NO LONGER IN USE)

MONUMENT
CORPS OF ENGINEERS U.S.A.
H.B. 17+19 YEAR 1983
ELEV. 650.563 (WPSC)

OHIO RIVER

ENGLISH (FEET) 0 50 100 150 200

COLUMBIA GAS RECTIFIER & GROUND BED
ON LINE 29
BURIED APPROX. 500'-0" OF 1/2" CP CABLE 3'-0" DEEP
BURIED 20 12'-0" MAGNESIUM ANODES
SPACED 10'-0" APART ALTERNATING SIDES APPROX 10'-0" DEEP

ENGLISH (FEET) 0 50 100 150 200

LEGEND

- OUTFALL 001
- OUTFALL 002
- OUTFALL 003 (PLUGGED)
- OUTFALL 004 (PLUGGED)
- OUTFALL 005
- DASHED LINES INDICATE UNDERGROUND LINES
- ABANDONED LINES
- STORMWATER DRAINAGE BOUNDARIES
- MANHOLE
- BURIED MANHOLES
- CATCH BASIN
- BURIED BASIN
- CITY STREET DRAINS TO OUTFALL 002
- CITY STREET DRAINS TO WWTP
- CITY STORM SEWER DRAINS INTO OUTFALL 002

OUTFALL 001 APPROX AREA = 11.36 ACRES
OUTFALL 002 APPROX AREA = 7.63 ACRES

LOWER GAUGE AT PIKE ISLAND DAM, ZERO ELEVATION OF LOWER GAUGE – 611.000'
PLANT LOCATED 3.8 MILES SOUTH OF ZERO GAUGE
PIKE ISLAND DAM LOWER POOL ELEV. (HANNIBAL POOL) – 623.000'
PIKE ISLAND DAM UPPER POOL ELEV. – 644.000'

REFERENCES
3-04389
3-06350 (KEY)
3-10612
3-10615

REVISIONS			
MK	BY	DATE	DESCRIPTION
A	BLOOR	020904	ISSUED FOR APPROVAL
B	AWM	081704	FINAL
C	JCC	8/27/07	ADDED STREET DRAIN DESIGNATION

TOLERANCES UNLESS OTHERWISE SPECIFIED
FRACTIONS ± 1/64" FABRICATING± 1/16"
DECIMALS ± .005 ALL THREADS - CLASS 2 FIT
ANGLES ± 1/2"

TITLE:	MARTINS FERRY - STORM WATER PREVENTION PLAN (BY OUTFALLS)			ISSUED FOR:	PRELIMINARY
VENDOR	WPSC	DRAWN BY	B. BLOOR	PLANT: MARTINS FERRY	COMMENT
VENDOR DWG. No.	3-50060	CHECKED BY	W. PYSH	DEPARTMENT: UTILITIES	APPROVAL
SHOP ORDER No.	STORM	APPROVED BY	O. WAMSLEY	EQUIPMENT: SEWER/SEWAGE SYSTEMS	BID
DISCIPLINE	PIPING			COMPONENT: SEWERS	CONSTRUCTION
DWG. TYPE	KEY-PLAN	EQUIP. LOC.	GENERAL/OTHER	SUB COMP.: PIPE	AS BUILT X

REV: C

SCALE: 1"=80'-0"

DATE: 1/8/01

Wheeling Pittsburgh STEEL CORPORATION
a metal products company

3-50060 1 OF 1

Aug 30, 2007 – 14:07:39 JCC M:\ENGR'G CADD DRIVE\LOADED TO EDMS\SPCC\MARTIN'S FERRY\ 3-50060.dwg